IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IBERIA HAMPTON, Administratrix, on behalf of THE ESTATE OF FRED A. HAMPTON, Deceased,

Plaintiff,

-vs-

THE CITY OF CHICAGO; COOK COUNTY, ILLINOIS; EDWARD V. HANRAHAN, RICHARD S. JALOVEC, DET. JAMES DAVIS, SERGEANT DANIEL GROTH, DET. EDWARD CARMODY, DET. JOHN CISZEWSKI, DET. RAY BRODERICK, DET. GEORGE JONES, JOHN MARUSICH, LYNWOOD HARRIS, FRED HOWARD, WILLIAM CORBETT, WILLIAM KELLY, PHILIP JOSEPH, WILLIAM GORMAN, ROBERT HUGHES, JOHN DOE, and OTHERS NOT PRESENTLY KNOWN TO THE PLAINTIFF,

Defendants.

CIVIL ACTION
NO. 70-C-1384
Judge Joseph S. Perry
COMPLAINT FOR DAMAGES

JURISDICTION

1. This is a civil action seeking redress against the defendants for committing acts under color of law, depriving the deceased, FRED A. HAMPTON, as represented by the plaintiff, of his rights under the Constitution and laws of the United States. Specifically, the defendants, while acting in their individual and official capacities as Chicago policemen, state's attorney's police, and as state, county, and city officials did cause the death of said FRED A. HAMPTON, on or about December 4, 1969, depriving him under color of law of his rights, privileges, and

immunities as guaranteed by the First, Fourth, Fifth, Eighth, Ninth, Thirteenth and Fourteenth Amendments to the Constitution of the United States and under 42 U.S.C., Sections 1981, 1982, 1983, 1985, and 1986. Plaintiff seeks further redress for the wrongful death of FRED A. HAMPTON as provided under 42 U.S.C. Sections 1983 and 1988, and Chapter 70 Sec. 70-1, 2, Ill. Rev. Stat.

2. The jurisdiction of this court is further invoked pursuant to 28 U.S.C. Sections 1331 and 1343. The amount in controversy, exclusive of costs and interest, exceeds ten thousand dollars.

PARTIES

A. Plaintiff

3. Plaintiff, the natural and legal mother of the deceased, is the duly appointed administratrix of the decedent's estate. The Plaintiff is a resident of the State of Illinois and a citizen of the United States.

4. The decedent was, at the time of death, twenty-one years of age, a resident of the State of Illinois and a black citizen of the United States.

B. Defendants

5. Defendant HANRAHAN was at all times material to this complaint the duly elected State's Attorney for Cook County, Illinois. Defendant JALOVEC was at all times material to this complaint a duly appointed Assistant State's Attorney for Cook County, Illinois, and in charge of the Special Prosecutions Unit of said State's Attorney's Office.

6. Defendants GROTH, DAVIS, CARMODY, CISZEWSKI,

GORMAN, BRODERICK, JONES, HUGHES, JOSEPH, MANUSICH, HARRIS, HOWARD, CORBETT, and KELLY were, at all times material to this complaint, duly appointed police officers of the City of Chicago, detailed to the Cook County State's Attorney's Office as State's Attorney's Police.

7. Defendant Doe, and others not presently known to the Plaintiff were Chicago policemen, State's Attorney's police, and other state, county and city officials and agents.

8. Plaintiff sues each and all defendants in both their individual and official capacities.

NOTICE

9. The following Notice was sent in accordance with Ill. Rev. Stat. ch. 85, Section 8-102:

TO: Edward V. Hanrahan
Cook County State's Attorney

Matthew J. Danaher
Clerk, Cook County, Illinois

City of Chicago
Corporation Counsel

John C. Marcin
City Clerk, City of Chicago

You are hereby notified that a cause of action has accrued against you for personal injuries sustained, arising out of an accident, and following is a statement relating to the occurrence:

(1) The name of the person to whom a cause of action has accrued is Mrs. Iberia Hampton, as Administratrix of the Estate of Fred Hampton.

(2) The name and address of the person who was injured is Fred Hampton, 2337 W. Monroe Street, Chicago,

Illinois.

(3) The accident and injuries to said person occurred on or about towit: the 4th day of December, 1969, at the hour of 4:45 a.m., at or inside the vicinity of the apartment at 2337 W. Monroe Street, Chicago, Illinois.

(4) Statement of the accident: Mr. Hampton suffered gunshot wounds from which he eventually died. Said wounds were inflicted by Cook County State's Attorney's police.

(5) The name and address of the injured person's physician: Death certificate signed by E. J. Shalgos, M.D., Cook County Coroner's Office.

(6) The name and address of hospital where injured party was attended: Dead on arrival at Cook County Hospital.

COUNT ONE

10. At some time on or prior to the morning of December 4, 1969, defendants HANRAHAN, JALOVEC, GROTH, DAVIS, CARMODY, CISZEWSKI, GORMAN, JONES, HUGHES, JOSEPH, MARUSICH, HARRIS, HOWARD, CORBETT, KELLY, BRODERICK, DOE, and others not presently known to the Plaintiff did meet and plan a raid upon the apartment located at 2337 West Monroe, Chicago, Illinois, in which the deceased, FRED HAMPTON, did reside.

11. At approximately 4:00 a.m. on December 4, 1969, Chicago policemen, upon orders from the defendants, did cordon off the area surrounding FRED HAMPTON'S residence from the public.

12. At approximately 4:15 a.m. on December 4, 1969, Defendants GROTH, DAVIS, CARMODY, CISZEWSKI, JONES, GORMAN, HUGHES, BRODERICK, MARUSICH, HARRIS, HOWARD, CORBETT, KELLY, JOSEPH, and others not presently known to the Plaintiff, did, under color of state search warrant and otherwise under color of law, illegally enter the residence of FRED HAMPTON.

13. Said Defendants did unlawfully fire without provocation over ninety bullets from machine guns, pistols, shotguns, and carbines into the general living quarters of FRED HAMPTON, while executing said illegal raid.

14. The deceased, FRED HAMPTON, was in bed in a bedroom when the defendants executed this illegal raid.

15. Said defendants did fire with automatic machine guns, pistols, and shotguns over thirty bullets into FRED HAMPTON'S bedroom while he lay in bed.

16. Several bullets hit FRED HAMPTON while he lay in bed, with at least two piercing the skull, one grazing the right arm, and one entering the left shoulder.

17. The use of excessive and deadly force without legal justification by said Defendants did grievously and critically wound FRED HAMPTON. Said wounds did ultimately cause the death of FRED HAMPTON.

18. Said Defendants, without knowing whether the decedent, FRED HAMPTON, was still alive or dead, did drag him from his bed to the dining room floor.

19. Said defendants did illegally search and ransack deceased's apartment, stealing money and personal property from the apartment, damaging and destroying his personal property, and spoliating the evidence of their illegal acts.

20. Defendants HANRAHAN, JALOVEC, DAVIS, GROTH, JONES, CARMODY, CISZEWSKI, GORMAN, HUGHES, BRODERICK, KELLY, JOSEPH, CORBETT, MARUSICH, HARRIS, HOWARD and others not presently known to the Plaintiff, did willfully, maliciously, and with specific intent plan and execute the acts as alleged in Paragraphs 10-19. These acts did directly and proximately cause the serious injury and death of FRED HAMPTON. This unjustifiable use of excessive and deadly force by these defendants, acting under color of law, did deprive the deceased of his rights, privileges, and immunities as guaranteed by the Constitution and laws of the United States, specifically 42 U.S.C. 1981 et seq.

21. The unlawful and sadistic acts of said defendants, perpetrated upon FRED HAMPTON, Chairman of the Illinois Black Panther Party, because of his beliefs, thoughts, words, and associations, deprived the deceased of his rights to free speech, expression, and assembly as guaranteed by the First Amendment to the Constitution of the United States.

22. FRED HAMPTON was deprived of his right to be free from illegal searches and seizures as guaranteed by the Fourth Amendment to the Constitution of the United States by the illegal entry and pillaging of his residence by said defendants.

23. FRED HAMPTON was deprived of his right to life, liberty and property as guaranteed by the Fifth and Fourteenth Amendments to the Constitution of the United States by his illegal and summary execution by said defendants, which not only denied FRED HAMPTON due process of law

but flaunted said denial to create fear and terror in the Black Community of Chicago.

24. FRED HAMPTON was deprived of his right to be free from cruel and unusual punishment as guaranteed by the Eighth Amendment to the Consitution of the United States, by the defendants' brutal and unjustifiable killing of said deceased.

25. FRED HAMPTON was deprived of his right to privacy as guaranteed by the Ninth Amendment to the Constitution of the United States by said defendants' illegal entry and unjustifiable use of deadly and excessive force.

26. The deprivation of rights guaranteed to the deceased by the First, Fourth, Fifth, Eighth and Ninth Amendments are protected against state action by the due process clause of the Fourteenth Amendment.

27. These acts perpetrated on FRED HAMPTON as a black citizen were so contrary to all Constitutional standards of humanity that he was thereby deprived of his right to be free from badges and indicia of slavery as guaranteed by the Thirteenth Amendment to the Constitution of the United States.

28. FRED HAMPTON was deprived of his right to equal protection of the laws as guaranteed by the Fourteenth Amendment to the Constitution of the United States as said defendants under color of law did execute the deceased because of his race and his political beliefs.

WHEREFORE Plaintiff, on behalf of the estate of FRED HAMPTON, demands judgment against each defendant named in Count One, jointly and severally, in the amount

of $250,000, compensatory damages and further demands punitive damages against each defendant, jointly and severally in the amount of $500,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, proper, and equitable.

COUNT TWO

29. Plaintiff alleges and realleges paragraphs 1-28 with the same force and effect as if fully set forth herein.

30. Defendants DAVIS, GROTH, CARMODY, CISZEWSKI, JONES, HUGHES, GORMAN, KELLY, JOSEPH, CORBETT, MARUSICH, HARRIS, HOWARD, BRODERICK and others not presently known to the Plaintiff did negligently use deadly and excessive force under color of law and by these illegal acts did directly and proximately cause serious injury and death to FRED HAMPTON, depriving him of his rights, privileges, and immunities under the Constitution and laws of the United States, specifically 42 U.S.C. Sections 1981 et. seq.

31. Defendants HANRAHAN, JALOVEC, GROTH, DOE, and others not presently known to the Plaintiff, acting under color of law, did negligently plan and create a situation where deadly and excessive force was likely to be used and did negligently allow this deadly and excessive force to be used, proximately and directly causing serious injury and death to FRED HAMPTON, depriving him of his rights, privileges and immunities under the Constitution and laws of the United States, specifically 42 U.S.C. Sections 1981 et seq.

WHEREFORE the Plaintiff, on behalf of the estate of FRED HAMPTON demands judgment against each defendant named

in Count Two, jointly and severally, in the amount of $250,000 compensatory damages and further demands punitive damages against each defendant, jointly and severally, in the amount of $500,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just and equitable.

COUNT THREE

32. Plaintiff alleges and realleges paragraphs 1-31 with the same force and effect as if fully set forth herein.

33. Defendants HANRAHAN, JALOVEC, GROTH, DAVIS, CISZEWSKI, GORMAN, BRODERICK, HUGHES, JONES, KELLY, JOSEPH, CORBETT, MARUSICH, HARRIS, HOWARD, CARMODY, and other defendants not presently known to the Plaintiff, prior to the illegal raid of December 4, 1969, upon FRED HAMPTON'S residence did meet and plan this illegal raid and did agree and conspire together to use excessive and deadly force upon the deceased and others in the residence. Each defendant did agree to and did plan this raid with the knowledge and purpose that it would deprive FRED HAMPTON of his rights, privileges and immunities as guaranteed under the Constitution and laws of the United States, specifically 42 U.S.C. 1983 and 1985. They did purposefully plan, while acting under the guise and color of state law, statutes, and customs, to discriminate against the deceased because of his belonging to the black race and because of his political beliefs. Acting in accordance with this plan and conspiracy, the defendants did execute this illegal raid and did use brutal and excessive

force. This use of deadly and excessive force by the defendants did proximately cause the serious injury and death of Fred Hampton, depriving the deceased of his rights, privileges, and immunities, while acting under color of state law, customs, and statutes. This conspiracy and these overt acts of the defendants did proximately cause FRED HAMPTON'S injury and death, depriving him of the most fundamental Constitutional right, his right to live.

WHEREFORE the Plaintiff, on behalf of the estate of FRED HAMPTON demands judgment against each Defendant named in this count, jointly and severally in the amount of $250,000 compensatory damages and further demands punitive damages against each Defendant, jointly and severally for the amount of $500,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper and equitable.

COUNT FOUR

34. Plaintiff alleges and realleges paragraphs 1-33 with the same force and effect as if fully set forth herein.

35. Defendants HANRAHAN, JALOVEC, GROTH, DAVIS, CISZEWSKI, GORMAN, CARMODY, JONES, HUGHES, KELLY, BRODERICK, JOSEPH, CORBETT, HARRIS, MARUSICH, HOWARD, and others not presently known to the Plaintiff did have knowledge of the conspiracy to deprive FRED HAMPTON of his rights, privileges, and immunities as guaranteed by the Constitution and laws of the United States, prior to the execution of this illegal raid. These defendants did have the power to prevent the committing of these illegal acts against the deceased and did neglect and refuse to prevent these illegal acts. These illegal

acts were committed during the raid upon the residence of FRED HAMPTON and did proximately cause his death, contrary to the provisions of 42 U.S.C. 1986.

WHEREFORE Plaintiff, on behalf of the estate and next of kin of FRED HAMPTON, demands judgment in the amount of $5,000.

COUNT FIVE

36. Plaintiff alleges and realleges paragraphs 1-35 with the same force and effect as if fully stated herein.

37. Defendant City of Chicago was and still is the statutory public employer of Defendants GROTH, DAVIS, JONES, CARMODY, BRODERICK, GORMAN, HUGHES, KELLY, MARUSICH, CISZEWSKI, JOSEPH, CORBETT, HARRIS, HOWARD, and others not presently known to the Plaintiff.

38. Defendant City of Chicago did fail to properly hire, train and supervise said Defendant Police Officers who were at the time of the illegal raid assigned to the Cook County State's Attorney's Office.

39. Defendant City of Chicago had consistently failed to discipline officers who had used deadly and excessive force against citizens in the past. Said failure to so discipline past offenders of the Chicago Police Department was known to the defendants and did give said Defendant police officers license to use excessive and deadly force against the deceased, FRED HAMPTON, without fear of punishment.

40. The raid upon the residence of FRED HAMPTON, on the morning of December 4, 1969, by the duly appointed Defendant Chicago police officers did proximately cause the death of

FRED HAMPTON and did deprive him of his right to full and equal benefit of all laws; as this raid was illegal and performed in a discriminatory and racist manner against the deceased, a black man, contrary to the provision of 42 U.S.C. 1981 and 1983.

41. Defendant City of Chicago's grossly negligent failure to properly hire, train and supervise said defendants and said Defendant's negligent failure to properly discipline past police offenders did directly and proximately cause the serious injury and death of FRED HAMPTON.

WHEREFORE Plaintiff, on behalf of the estate of FRED HAMPTON, demands judgment against Defendant City of Chicago in the amount of $500,000 compensatory damages, plus the cost of this action, attorney's fees, and such other relief as to this court seems just and equitable.

COUNT SIX

42. Plaintiff alleges and realleges paragraphs 1-41 with the same force and effect as if fully stated herein.

43. Plaintiff's remedy under the Constitution and laws of the United States is inadequate and deficient; therefore, under the authority of 42 U.S.C. Section 1983 and 1988, Plaintiff seeks further remedy under state law, Constitution and statute, specifically Ch. 70 Sec. 1, 2 Ill. Rev. Stat.

44. Decedent FRED HAMPTON was and is survived by his legal and natural father, FRANCIS HAMPTON, and his legal and natural mother, Mrs. IBERIA HAMPTON.

45. Decedent was and is survived by his natural and legal brother, WILLIAM HAMPTON, and his natural and legal sister, DELORES HAMPTON.

46. Decedent FRED HAMPTON was and is survived by his then unborn child who was born on December 29, 1969, and is named FREDRICK JAKE JOHNSON.

47. Plaintiff-Administratrix is the duly appointed legal representative of the estate of FRED HAMPTON.

48. Defendants HANRAHAN, JALOVEC, DAVIS, CARMODY, GORMAN, GROTH, BRODERICK, CISZEWSKI, KELLY, JOSEPH, CORBETT, MARUSICH, HARRIS, HOWARD, HUGHES, JONES, and others not presently known to the Plaintiff did, by their wrongful acts as alleged in paragraphs 1-41 deprive the deceased of his rights, privileges, and immunities under the Constitution and laws of the United States and did by their willful, intentional and negligent acts proximately cause the wrongful death of FRED HAMPTON.

49. Decedent FRED HAMPTON was officially pronounced dead on December 4, 1969.

50. Decedent FRED HAMPTON exercised due care at all times material to this complaint.

51. Each and every beneficiary and next of kin of FRED HAMPTON exercised due care at all times material to this complaint.

52. FRANCIS HAMPTON, IBERIA HAMPTON, WILLIAM HAMPTON, DELORES HAMPTON, and FREDRICK JAKE JOHNSON and each of them have lost and will continue to lose pecuniary support as a proximate result of the illegal acts of the defendants and because of the wrongful death of FRED HAMPTON.

WHEREFORE Plaintiff demands judgment against each defendant named in Count Six, jointly and severally for pecuniary damages in the amount of $500,000.

COUNT SEVEN

53. Plaintiff alleges and realleges paragraphs 1-52 with the same force and effect as if fully set forth herein.

54. Defendant City of Chicago was and is a duly incorporated municipality under the Constitution, laws and statutes of the state of Illinois.

55. Defendant Cook County, Illinois, is a duly incorporated municipal county under the laws, statutes, and Constitution of the state of Illinois.

56. Defendants GROTH, DAVIS, CISZEWSKI, CARMODY, BRODERICK, GORMAN, HUGHES, JONES, HOWARD, KELLY, JOSEPH, CORBETT, MARUSICH, HARRIS, and others not presently known to the Plaintiff were duly employed police officers for the City of Chicago at all times material to this complaint.

57. Defendants HANRAHAN, JALOVEC, and others not presently known to the Plaintiff were duly elected and appointed officials of Cook County and were in the employment of this County.

58. At all times material to this complaint said defendant City and County Officials were acting within the scope of employment of said City and County and were acting as agents and employees thereby. While acting in this capacity said defendants did commit illegal acts as alleged in paragraphs 1-52. These wrongful acts were committed negligently by said defendants and did proximately and directly cause the death of FRED HAMPTON.

WHEREFORE Plaintiff, on behalf of the estate of FRED HAMPTON, demands judgment against Defendant City of Chicago and Defendant Cook County, Illinois, jointly and severally in the amount of $500,000 compensatory damages, plus the costs of this action, attorney's fees, and such other relief as seems just, proper, and equitable.

Respectfully submitted,

Dennis Cunningham

Jeffrey Haas

Francis E. Andrew

Plaintiff demands trial by jury.

Dennis Cunningham

Jeffrey Haas

Francis E. Andrew

DENNIS CUNNINGHAM
JEFFREY HAAS
FRANCIS E. ANDREW
Attorneys for Plaintiff
2156 North Halsted Street
Chicago, Illinois 60614

WILLIAM J. BENDER
ARTHUR KINOY
Center for Constitutional Rights
588 Ninth Avenue
New York, New York 10036

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IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FANNIE MAE CLARK, Administratrix of the Estate of MARK CLARK, deceased,	)	
Plaintiff	)	
vs.	)	NO. _____
THE CITY OF CHICAGO, a Municipal Corporation, EDWARD V. HANRAHAN, State's Attorney of Cook County, Police Officers: DANIEL R. GROTH, JAMES DAVIS, RAYMOND D. BRODERICK, EDWARD CARMODY, JOHN CICZEWSKI, WILLIAM T. CORBET, JOSEPH F. GORMAN, LYNWOOD HARRIS, FRED HOWARD, ROBERT HUGHES, GEORGE JONES, WILLIAM T. KELLY, PHILIP JOSEPH, JOHN MARUISCH; JOHN DOE and others presently unknown to Plaintiff,	)	
Defendants	)	

COMPLAINT

JURISDICTION

Jurisdiction of this Court is invoked under 28 U. S. C. 1331 and 1334, and 42 U. S. C. 1981, 1983, 1985 and 1986. Jurisdiction is further invoked under the First, Fourth, Fifth, Eighth, Ninth, Thirteenth and Fourteenth Amendments to the Constitution of the United States. Plaintiff brings this action to vindicate rights protected by the aforementioned Amendments to the United States Constitution. The amount in controversy, exclusive of costs and interest, exceeds Ten Thousand ($10,000) Dollars.

FOR A FIRST CLAIM

Now comes FANNIE MAE CLARK, Administratrix of the Estate of MARK CLARK, Deceased, by her Attorney, CORNELIUS E. TOOLE, and complaining of the Defendants, CITY OF CHICAGO, EDWARD V. HANRAHAN and all Defendants, alleges as follows:

1. That on or about the 26th day of May, 1970, the Plaintiff was duly appointed Administratrix of the Estate of MARK CLARK, Deceased, hereinafter referred to as the Deceased, by the Probate Division of Cook County, Illinois, and duly qualified for said office, and ever since has been, and is now administrator, pursuant to and as authorized by Chapter 70 of the Illinois Revised Statutes.

2. That said Deceased left him surviving no widow and no child or children of a predeceased child or children, but left him surviving his mother, FANNIE MAE CLARK, and his brothers and sisters, WILLIAM CLARK, JR., SAMUEL CLARK, JAMES CLARK, MATTHEW CLARK, GEORGE CLARK, CHARLES CLARK, JOSEPH CLARK, LUKE CLARK,

JOHN THOMAS CLARK. ROBERT CLARK, ELLA MAE MARION, PATRICIA CLARK, ELNER CLARK. GLORIA JACKSON, GERTRUDE CLARK and ROSE MARIE CLARK, as his sole and only heirs at law, all of whom are still living and by reason of the death of the said deceased, the said persons hereinbefore named have been deprived of future estate and have been deprived of his companionship, relationship, love and affection, and to further incur expenses for his funeral.

3. Plaintiff and the heirs of the deceased hereinabove referred to were and still are citizens of the United States, and are residents of the State of Illinois; and that the Deceased was at the time of and preceding his death a citizen of the United States, residing in the State of Illinois

4. During all times mentioned herein, the defendant, EDWARD V. HANRAHAN, hereinafter referred to as defendant HANRAHAN, was the duly elected State's Attorney of Cook County, Illinois. Defendant Officers DANIEL R. GROTH, JAMES DAVIS, RAYMOND D. BRODERICK EDWARD CARMODY, JOHN CICZEWSKI, WILLIAM T. CORBET, JOSEPH F. GORMAN, LYNWOOD HARRIS, FRED HOWARD, ROBERT HUGHES, GEORGE JONES, WILLIAM T. KELLY, PHILIP JOSEPH, JOHN MARUISCH, hereinafter referred to as Defendants, GROTH, DAVIS, BRODERICK, CARMODY, CICZEWSKI, CORBET, GORMAN, HARRIS, HOWARD, HUGHES, JONES, KELLY, JOSEPH, and MARUIRSCH, were duly appointed, qualified and acting police officers employed by the Police Department of the defendant.

CITY OF CHICAGO, hereinafter referred to as Defendant CITY, a municipal corporation of the State of Illinois, and were agents of said defendant CITY, acting in the course of their employment and engaged in the performance of their duties as police officers in the City of Chicago and were acting under color of statutes, ordinances, regulations, customs and usages of the City of Chicago, County of Cook and State of Illinois

5. On or about December 4, 1969, in or about the vicinity of 2337 West Monroe, the defendants GROTH, DAVIS, BRODERICK CARMODY, CICZEWSKI, CORBET, GORMAN, HARRIS, HOWARD, HUGHES, JONES, KELLY, JOSEPH, MARUISCH, shot and killed the deceased, MARK CLARK, without any authority in law.

6. At said time and place, the defendants referred to in the Complaint, or one or more of them, denied the deceased due process of law by imposing summary punishment by death upon the deceased.

WHEREFORE, the plaintiff, as Administratrix of the Estate of MARK CLARK and on behalf of said Estate, claims damage in the sum of THREE MILLION AND NO/100 DOLLARS ($3,000,000.00) against the defendants, CITY OF CHICAGO, HANRAHAN, GROTH, DAVIS, BRODERICK, CARMODY, CICZEWSKI, CORBET, GORMAN, HARRIS, HOWARD, HUGHES, JONES, KELLY, JOSEPH, and MARUISCH, jointly and severally, together with costs herein.

1981

FOR A SECOND CLAIM

Plaintiff realleges paragraphs One through Six as contained and set forth in the first claim and incorporates the allegations as paragraphs one through six of this second claim.

7. The deceased was non-white and Black.

8. At the time and place hereinabove alleged, the defendants or more or one of them, deprived the deceased of and denied to him the full and equal benefit of all laws and proceedings for the security of persons as is enjoyed by white citizens, and to be subject to like punishment of every kind and no other, by imposing summary punishment by death upon the deceased.

WHEREFORE, the Plaintiff, as Administratrix of the Estate of MARK CLARK, and on behalf of the Estate, claims damages in the sum of THREE MILLION and NO/100 DOLLARS ($3,000,000.00) against each defendant jointly and severally, together with costs herein.

FOR A THIRD CLAIM

Plaintiff realleges paragraphs One through Six of the first claim as set forth hereinabove and incorporates the allegations as paragraphs one through six of this third claim.

7. At the time and place alleged hereinabove, the defendants or two or more of them, conspired to deprive the Deceased of the equal protection of the laws, by imposing summary punishment by death upon the deceased thereby denying to him his right to live and not to be deprived

of his life without due process of law and discriminating against the deceased in the treatment and method of apprehending a person for a supposed offense against the laws.

WHEREFORE, the Plaintiff, as Administratrix of the Estate of MARK CLARK, and on behalf of the Estate, claims damages in the sum of THREE MILLION and NO/100 DOLLARS ($3,000,000.00) against each defendant jointly and severally, together with costs herein.

FOR A FOURTH CLAIM

Plaintiff realleges paragraphs One through Six of the first claim as set forth hereinabove and incorporates the allegations as paragraphs one through six of this fourth claim.

7. On or about December 4, 1969, the deceased was in the vicinity of 2337 West Monroe, Chicago, Cook County, Illinois.

8. At the time and place, the deceased was peaceable and not violating any Statute or Ordinance.

9. The defendants on or about December 4, 1969 planned a raid on an apartment at 2337 West Monroe.

10. The defendant Officers of the City of Chicago, under color of a search Warrant illegally entered 2337 West Monroe, Chicago Cook County, Illinois.

11. At the time and place the deceased had not committed any felony

12. The defendant City of Chicago Officers referred herein, without provocation fired bullets from machine guns and shotguns, revolvers and carbines in the building at 2337 West Monroe in executing the planned

illegal raid.

13. several bullets from the weapons of the defendant officers penetrated the body of the deceased wounded him and ultimately caused his death.

14. The death of the deceased was the direct and proximate result of the entry and penetration of a bullet or bullets fired at him as aforedescribed into his body.

15. Without admitting its applicability to the cause of action stated herein, the plaintiff says that on May 28, 1970, a notice in words and figures as per copy attached hereto as Exhibit B, was served upon the proper officials of the City of Chicago.

WHEREFORE, the Plaintiff, as Administratrix of the Estate of MARK CLARK, and on behalf of the Estate, claims damages in the sum of THREE MILLION and NO/100 DOLLARS ($3,000,000.00) against each defendant jointly and severally, together with costs herein.

FOR A FIFTH CLAIM

Plaintiff realleges paragraph One through Five of the first claim as set forth hereinabove and incorporates the allegations as paragraphs one through five of this fifth claim.

6. Plaintiff realleges paragraphs six through fifteen of her fourth claim as set forth hereinabove and incorporates the allegations as paragraphs six through fifteen of this fifth claim.

16. That the Defendant HANRAHAN, and or his Assistant State's Attorney did with the defendant officers of the City of Chicago, wilfully, maliciously and with specific intent, plan and execute the acts as alleged herein.

17. The acts proximately and directly caused the injury and death of the deceased.

18. The unjustifiable use of excessive force by the defendants herein acting under color of law, deprived the deceased of his rights, privileges and immunities as guaranteed by the Constitution of the United States and the laws therein.

19. The joint and several acts of defendants, as hereinbefore alleged, were the result of a tacit understanding on the part of defendants to treat the deceased as they did because deceased was Black, and was to deny to the deceased the equal protection and due process of the law.

20. That the death of the deceased was the direct and proximate result of the entry and penetration of a bullet or bullets fired at him into his body.

21. That at all times pertinent hereto, the deceased was not engaged in any wilful and wanton conduct proximately causing the death of the deceased.

WHEREFORE, the Plaintiff, FANNIE MAE CLARK, as Administratrix

of the Estate of the Deceased, MARK CLARK, and on behalf of the Estate claims damages in the sum of THREE MILLION ($3,000,000) DOLLARS against each defendant jointly and severally, together with costs herein.

CORNELIUS E. TOOLE, General Counsel
Legal Office of the Chicago Metropolitan Council, National Association for the Advancement of Colored People,
Attorney for Plaintiff
407 South Dearborn
Chicago, Illinois 60605
939-5365

Of Counsel:

James D. Montgomery
Attorney at Law
10 South LaSalle Street
Chicago, Illinois 60603
346-3035

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VERLINA BREWER, by her next friend, WILLIAM R. BREWER,

Plaintiff,

-vs-

THE CITY OF CHICAGO, a Municipal Corporation; COOK COUNTY, ILLINOIS, a Local Corporation; EDWARD V. HANRAHAN; RICHARD S. JALOVEC; DANIEL GROTH, RAY BRODERICK, EDWARD CARMODY, JOHN CHEEWSKI, WILLIAM CORBETT, JAMES DAVIS, JOSEPH GORMAN, LYNWOOD HARRIS, FRED HOWARD, ROBERT HUGHES, GEORGE JONES, PHILIP JOSEPH, WILLIAM KELLY, JOHN MARUSICH; RICHARD J. DALEY, Mayor of the City of Chicago; JAMES B. CONLISK, Superintendent, Chicago Police Department; JOHN MULCHRONE; HARRY ERVANIAN; SGT. JOHN MEADE, LT. ROBERT KUKOWINSKI; JAMES MELTREGER, SHELDON SOROSKY, DAVID PURTELL, JOHN SADUNAS, CHARLES KOLUDROVIC, JAMES DOE, RICHARD ROE, and OTHERS NOT PRESENTLY KNOWN TO THE PLAINTIFF,

Defendants.

CIVIL ACTION NO. _____

COMPLAINT FOR DAMAGES

JURISDICTION

1. This is a civil action seeking redress against the defendants for committing acts under color of law, depriving the plaintiff of her rights under the Constitution and laws of the United States. Specifically, some or all of the defendants, while acting in their individual and official capacities as Chicago policemen, state's attorney's police, and as state, county, and city officials, on December 4, 1969, assaulted the plaintiff with deadly weapons, caused serious bodily injury

to her, and thereafter imprisoned her falsely and prosecuted her wrongfully and maliciously in an attempt to conceal the true nature of the occurrences of December 4, 1969. By these acts committed under color of state law, the defendants deprived the plaintiff of her rights, privileges and immunities as guaranteed by the First, Fourth, Eighth, Ninth, Thirteenth and Fourteenth Amendments to the Constitution of the United States and protected under 42 U.S.C., Sections 1981, 1982, 1983, 1985, 1986, and 1988.

2. The jurisdiction of this Court is further invoked pursuant to 28 U.S.C., Sections 1331 and 1343. The amount in controversy, exclusive of interest and costs, exceeds the sum or value of ten thousand dollars.

3. The jurisdiction of this Court is further invoked pursuant to 28 U.S.C., Section 1332. Plaintiff is a citizen of the State of Michigan, Defendant CITY OF CHICAGO is a municipal corporation and Defendant COOK COUNTY, ILLINOIS is a local public corporation, incorporated, formed and operating under the laws of the State of Illinois and exercising their governmental functions solely in Illinois. All other defendants are citizens of the State of Illinois. The amount in controversy, exclusive of interest and costs, exceeds the sum or value of ten thousand dollars.

4. A copy of notice sent in accordance with Illinois Revised Statutes, Ch. 85, Section 8-102 is attached hereto as Appendix A and hereby made a part of this complaint.

PARTIES

A. Plaintiff

5. Plaintiff VERLINA BREWER is a resident and citizen of the City of Ann Arbor, the State of Michigan, and the United States. Plaintiff BREWER, a black female, is eighteen years of age, and is suing by her next friend, WILLIAM R. BREWER, a citizen of the State of Michigan. At the time of the raid hereinafter alleged, and at the inception of the conspiracy that was allegedly formed to suppress the true nature of that raid, Plaintiff was a member of the Black Panther Party.

B. Defendants

6. Defendant HANRAHAN was at all times material to this complaint the duly elected State's Attorney for Cook County, Illinois. Defendant HANRAHAN had supervisory authority over all Assistant State's Attorneys in the Office of the State's Attorney for Cook County, including defendants JALOVEC, MELTREGER, and SOROSKY, and supervisory authority over all officers of the Chicago Police Department assigned to the Office of the State's Attorney for Cook County, including defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH.

7. Defendant JALOVEC was at all times material to the complaint a duly appointed Assistant State's Attorney for Cook County, Illinois, and in charge of the Special Prosecutions Unit of said State's Attorney's office. Defendant JALOVEC was the immediate supervisor of defendant GROTH and the police officers in Groth's unit, and he represented some

or all of those defendants in the purported investigation of this matter by the Internal Inspections Division of the Chicago Police Department.

8. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY and MARUSICH were, at all times material to this complaint, duly appointed police officers of the City of Chicago, detailed to and/or on detached service with the Cook County State's Attorney's Office as State's Attorney's Police.

9. Defendant DALEY, at all times material to this complaint, was the duly elected Mayor of the City of Chicago, State of Illinois. In that capacity, he had appointed Defendant CONLISK to serve, subject to Defendant DALEY's continuing approval, as Superintendent of Police, Through his control over the office of Superintendent of Police, Defendant DALEY, at all times material to this complaint, had the power to direct the activities of the Chicago Police Department and its employees.

10. Defendant CONLISK, at all times material to this complaint, was the duly appointed Superintendent and Chief Executive Officer of the Chicago Police Department. In that capacity, he was responsible for the general management and control of the police department and had full and complete authority to administer the department, including the operations of the Internal Inspections Division and the Crime Laboratory of the Chicago Police Department.

11. Defendant MULCHROME was, at all times material to this complaint,

a duly appointed Deputy Superintendent of the Chicago Police Department with supervisory responsibility for the Internal Inspections Division of the Chicago Police Department.

12. Defendant ERVANIAN, at all times material to this complaint, was a Captain of the Chicago Police Department and Director of the Internal Inspections Department of the Chicago Police Department.

13. Defendant MEADE, at all times material to this complaint, was a duly appointed Sergeant in the employ of the Chicago Police Department. He was assigned special responsibility for the investigation by the Internal Inspections Division of the raid staged on December 4, 1969, on the apartment occupied by plaintiffs.

14. Defendant KUKOWINSKI, at all times material to this complaint, was a Lieutenant of the Chicago Police Department and the head of the Excessive Force Unit of the Internal Inspections Division of the Chicago Police Department.

15. Defendants SOROSKY and MELTREGER, at all times material to this complaint, were duly appointed Assistant State's Attorneys for Cook County, Illinois. Both were assigned to the Special Prosecutions Unit under the supervision of Defendant JALOVEC, and both represented Defendant State's Attorney's police in the purported investigation of this matter by the Internal Inspections Division of the Chicago Police Department.

16. Defendant PURTELL, at all times material to this complaint, was a duly appointed official in the Chicago Police Department and Director of the Crime Laboratory of the Chicago Police Department.

17. Defendant SADUNAS, at all times material to this complaint, was a duly appointed Firearms Examiner in the Crime Laboratory of the Chicago Police Department, who examined ballistics material recovered from the apartment occupied by Plaintiff.

18. Defendant KOLUDROVIC, at all times material to this complaint, was a duly appointed Sergeant in the Chicago Police Department and a supervising officer of the Mobile Crime Laboratory Unit of the Chicago Police Department Crime Laboratory. In his capacity as supervisor of the Mobile Crime Lab, defendant KOLUDROVIC was responsible for the careful and impartial investigation of the scene of every violent crime for the purpose of locating, gathering, labelling, photographing, and evaluating all items that might prove helpful as physical evidence found at the scene. In this capacity, defendant KOLUDROVIC was called to 2337 West Monroe Street, Chicago, on the morning of December 4, 1969.

19. Defendant JAMES DOE, at all times material to this complaint, was an evidence technician of the Area Task Force of the Chicago Police Department. In this capacity as an evidence technician, defendant JAMES DOE was responsible for the careful and impartial investigation of the scene of every violent crime for the purpose of locating, photographing, gathering, labelling, and evaluating all items that might prove helpful as physical evidence found at the scene. In this capacity, defendant JAMES DOE was called to 2337 West Monroe Street, Chicago on the morning of December 4, 1969.

20. Defendant RICHARD ROE, at all times material to this complaint, was a duly appointed Sergeant of the Chicago Police Department, assigned

to the Excessive Force Unit of the Internal Inspections Division of the Chicago Police Department. He was the immediate interrogator of Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH in the purported investigation of this matter by the Internal Inspections Division.

21. Defendant JOHN DOE, and others not presently known to the plaintiff, at all times material to this complaint, were Chicago policemen, State's Attorney's Police, and other Federal, State, County and City officials and agents who participated in the planning and execution of a raid on 2337 West Monroe Street, Chicago, and subsequent proceedings concerning that raid, including the purported investigation of the matter by the Internal Inspections Division of the Chicago Police Department, the inquest into the deaths of Fred Hampton and Mark Clark conducted by the Coroner of Cook County, and the presentation of criminal charges against plaintiffs, to the Cook County Grand Jury of January, 1970.

22. All defendants are sued in both their individual and official capacities.

23. On information and belief, all defendants are residents and citizens of the County of Cook, State of Illinois, and of the United States.

COUNT ONE

/ Intentional deprivation of civil rights by illegal entry, assault battery, and other illegal acts /

24. Plaintiff alleges and realleges paragraphs 1-23 with the

same force and effect as if fully set forth herein.

25. At some time or times on or prior to the morning of December 4, 1969, defendants HANRAHAN, JALOVEC, GROTH, DAVIS, CARMODY, CISZEWSKI, GORMAN, JONES, HUGHES, JOSEPH, MARUSICH, HARRIS, HOWARD, CORBETT, KELLY, BRODERICK, DOE, and others not presently known to the plaintiff, met in various groups and thereby together planned a raid upon the apartment located at 2337 West Monro Street, Chicago, Illinois, occupied by the plaintiff.

26. At approximately 4:45 a.m., on December 4, 1969, defendants GROTH, DAVIS, CARMODY, CISZEWSKI, CORBETT, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiff, under color of a search warrant illegally obtained from state authorities, and otherwise under color of law, illegally forced entry into the apartment at 2337 West Monroe, Chicago, Cook County, Illinois, occupied by Plaintiff.

27. After effecting this illegal entry, some or all of said defendants, under color of law but without justification, fired with submachine guns, shotguns and other weapons about sixty shots into the rooms occupied by plaintiff, VERLINA BREWER.

28. This gunfire grievously wounded Plaintiff.

29. Some of all of these defendants, acting under color of law as police officers, physically and verbally abused and illegally arrested Plaintiff.

30. Said defendants did illegally search and ransack the above-mentioned apartment. Under color of law but without justification,

said defendants took money, damaged and destroyed personal property of the plaintiff, and spoliated the evidence of the illegal acts committed by said defendants.

31. As a direct and proximate result of the afore-mentioned acts of the defendants, plaintiff has suffered injury and mental anguish, and will continue so to suffer in the future. Plaintiff has spent much time in the hospital, has undergone operations, and has received permanent physical injury which has caused physical pain and suffering in the past and will continue to cause such pain.

32. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the plaintiff, willfully, maliciously, and with specific intent planned and executed the acts as alleged in Paragraphs 25-31. These acts directly and proximately caused the serious injury to plaintiff. This unjustifiable use of excessive and deadly force by these defendants, acting under color of law, deprived the plaintiff of her rights, privileges and immunities as guaranteed by the Constitution and laws of the United States and protected under 42 U.S.C. Sections 1981 et seq., particularly Section 1983.

33. The unlawful and sadistic acts of said defendants, who attacked Plaintiff as a member of the Black Panther Party because of her beliefs, thoughts, words, and associations, deprived the Plaintiff of her right to free speech, expression, association, and assembly as guaranteed by the First Amendment to the Constitution of the United States.

34. Plaintiff was deprived of her right to be free from illegal

searches and seizures as guaranteed by the Fourth Amendment to the Constitution of the United States by the defendants' illegal entry into and pillaging of the apartment occupied by Plaintiff.

35. Plaintiff was deprived of her right to life, liberty and property as guaranteed by the Fifth and Fourteenth Amendments to the Constitution of the United States by her illegal and summary punishment by said defendants, which not only denied the Plaintiff due process of law but flaunted that denial to create fear and terror in the Black Community of Chicago.

36. Plaintiff was deprived of her right to be free from cruel and unusual punishment as guaranteed by the Eighth Amendment to the Constitution of the United States, by the defendants' brutal, unjustifiable, and summary punishment of said Plaintiff.

37. Plaintiff was deprived of her right to privacy as guaranteed by the Ninth Amendment to the Constitution of the United States by said defendants' illegal entry and unjustifiable use of deadly and excessive force.

38. The deprivation of rights guaranteed to the plaintiffs by the First, Fourth, Fifth, Eighth, and Ninth Amendments are protected against state action by the due process clause of the Fourteenth Amendment to the Constitution of the United States.

39. These acts perpetrated on plaintiff as a black citizen were so contrary to all standards of humanity and to all standards of constitutional government by law that plaintiff was thereby deprived of her right to be free from badges and indicia of slavery as guaranteed by the

Thirteenth Amendment to the Constitution of the United States.

40. Plaintiff was deprived of her right to equal protection of the laws as guaranteed by the Fourteenth Amendment to the Constitution of the United States as said defendant under color of law did shoot, wound, and brutalize the Plaintiff because of her race and political beliefs.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT TWO

/ Negligent deprivation of civil rights by illegal entry, assault and battery and other illegal acts./

41. Plaintiff alleges and realleges paragraphs 1-40 with the same force and effect as if fully set forth herein.

42. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, HARRIS, HOWARD, and others not presently known to the Plaintiff, under color of law, negligently used deadly and excessive force to assault plaintiff, and illegally forced entry into the apartment at 2337 West Monroe, Chicago, Cook County, Illinois, and by these illegal acts did directly and

and proximately cause serious injury, pain, suffering and humiliation to plaintiff, VERLINA BREWER, depriving her of her rights, privileges and immunities guaranteed by the Constitution and laws of the United States, as set forth in Count One above, particularly Paragraphs 33-40, and protected under 42 U.S.C., Sections 1981 et seq., particularly Section 1983.

43. Defendants HANRAHAN, JALOVEC, GROTH, JOHN DOE and others not presently known to the Plaintiffs, acting under color of state law, statute, ordinance, custom and usage, did negligently plan and create a situation where deadly and excessive force was likely to be used by planning to take on the raid of 2337 West Monroe Street excessive firearm weaponry; by planning to execute the raid in the early morning hours of December 4, 1969, when Defendants knew persons would be present in the apartment, rather than at a time when they knew the apartment to be vacant; by failing to equip the raiding party with tear gas or other means for peacefully subduing the occupants of the apartment if said occupants should resist service of the search warrant; and, on information and belief, in sending on this assignment officers who in the past had been found by the Chicago Police Department to have used excessive and deadly force to do damage to citizens in the black community. Said Defendants did thereafter negligently permit the use of deadly and excessive force, which proximately and directly caused serious injury, physical pain and suffering to Plaintiff VERLINA BREWER, depriving her of her rights, privileges and immunities guaranteed by the Constitution and laws of the United States, as set forth in Count One above, and particularly Paragraphs 33-40, and protected under 42 U.S.C., Sections

1981 et seq., particularly Section 1983.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her jointly and severally, for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT THREE

/Conspiracy for deprivation of Equal Protection of the Laws by illegal entry, assault, battery, and other illegal acts./

44. Plaintiff alleges and realleges Paragraphs 1-43 with the same force and effect as if fully set forth herein.

45. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVID, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and other defendants not presently known to the plaintiff, prior to the illegal raid of December 4, 1969, upon 2337 West Monroe Street, Chicago, Illinois, met and planned this illegal raid and agreed and conspired together to enter the apartment illegally and to use excessive and deadly force upon the occupants of 2337 West Monroe Street, which occupants included Plaintiff VERLINA BREWER. Each defendant did agree to and did plan this raid with the knowledge and purpose that it would deprive said occupants of their rights,privileges, and immunities including the Equal Protection of the Laws, as guaranteed under the

Constitution and laws of the United States, specifically 42 U.S.C., Sections 1983 and 1985. Said defendants did purposefully plan, while acting under the guise and color of state law, statutes, and customs, to discriminate against the occupants of 2337 West Monroe Street because they are members of the black race and because of their political beliefs. Acting in accordance with this plan and conspiracy, under color of state law the defendants did execute this illegal raid and did use brutal and excessive force, as set forth in the overt acts alleged in Paragraphs 25-32, above. This course of conduct by the defendants proximately caused serious injury to the plaintiff, as alleged in Paragraphs 27-40, and deprived her of the Equal Protection of the Laws.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT FOUR

/Neglect to prevent harm from conspiracy for deprivation of civil rights by illegal entry, assault, and other illegal acts./

46. Plaintiff alleges and realleges paragraphs 1-45 with the same force and effect as if fully set forth herein.

47. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the

Plaintiffs did have knowledge of the conspiracy as alleged in Paragraph 45 to deprive Plaintiff VERLINA BREWER of the Equal Protection of the Laws as guaranteed by the Constitution and laws of the United States, prior to the execution of this illegal raid. These defendants, as immediate superiors of the raiding party or as co-participants in the raid, did have the power to prevent the committing of these illegal acts against the Plaintiff and did neglect and refuse to prevent these illegal acts. These illegal acts were committed during the raid upon the apartment occupied by Plaintiff and did proximately cause serious injury to her as alleged in Paragraphs 27-40, contrary to the provisions of 42 U.S.C., Section 1986.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, AND others not presently known to her, jointly and severally, for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT FIVE

/Intentional deprivation of civil rights by false imprisonment./

48. Plaintiff alleges and realleges Paragraphs 1-47 with the same force and effect as if fully set forth herein.

49. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES,

JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiff did willfully, maliciously, and with specific intent cause plaintiff to be incarcerated without legal cause, to be precluded from gaining her liberty on bail, and to be prevented from demonstrating the lack of foundation of the charges against her thereby causing her to be deprived of their liberty without due process of law, in violation of the Fifth and Fourteenth Amendments of the Constitution of the United States, and in violation of rights protected under 42 U.S.C., Section 1983.

50. Said defendants did cause Plaintiff to be deprived of her liberty by pressing against her charges of attempted murder and aggravated battery that said defendants knew to be wholly unfounded; and by preventing Plaintiff from obtaining a preliminary hearing on December 5, 1969, whereby Plaintiff could have shown the lack of foundation of the charges.

51. The acts of said defendants were further intended to prevent Plaintiff from telling the public of the defendants' murderous conduct at 2337 West Monroe, Chicago, thereby intending to chill the exercise by Plaintiff of her right of free speech guaranteed by the First Amendment of the Constitution of the United States and 42 U.S.C., Section 1983.

52. As a result of the false charges lodged by these defendants, Plaintiff was imprisoned falsely under color of law for several days.

53. As a direct and proximate result of these false charges lodged by these defendants, Plaintiff VERLINA BREWER suffered serious injury to her reputation and severe mental anguish.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD,

HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT SIX

/Conspiracy for deprivation of Equal Protection of the Laws by false imprisonment./

54. Plaintiff alleges and realleges paragraphs 1-53 with the same force and effect as if fully set forth herein.

55. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiff on December 4, 1969, did meet and plan to lodge against Plaintiff charges they knew to be wholly unfounded, and did agree and conspire together to cause Plaintiff VERLINA BREWER to be imprisoned illegally. Each defendant did agree and did plan to place these charges with the knowledge and purpose that they would deprive Plaintiff of her rights, privileges, and immunities as guaranteed under the First, Fifth, and Fourteenth Amendments of the Constitution of the United States, and protected under 42 U.S.C., Sections 1983 and 1985. They did purposely plan, while acting under the guise and color of state law, statutes, and customs, to discriminate against the Plaintiff because she is a member of the black race and because of her political beliefs and associations. Acting in accordance with this plan and conspiracy, some or all of these defendants knowingly pressed false charges of attempted

murder and aggravated battery and willfully denied Plaintiff a preliminary hearing. This conspiracy and these overt acts by defendants did proximately cause Plaintiff's illegal imprisonment, as set forth in paragraphs 49-53, depriving her of rights under the First, Fifth and Fourteenth Amendments of the Constitution of the United States, including the right to Equal Protection of the Laws.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT SEVEN

/Neglect to prevent harm from conspiracy for deprivation of Equal Protection of the Laws by false imprisonment./

56. Plaintiff alleges and realleages paragraphs 1-55 with the same force and effect as if fully set forth herein.

57. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, HARRIS, CISZEWSKI, CORBETT, DAVIS, GORMAN, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiff did have knowledge of the conspiracy as alleged in paragraph 55 to deprive Plaintiff of the Equal Protection of the Laws as guaranteed by the Constitution and laws of the United States, prior to the lodging of the false charges of attempted murder and aggravated battery, and throughout the period during which Plaintiff was illegally confined.

These defendants did have the authority and power to prevent the committing of these illegal acts against the Plaintiff and did neglect and refuse to prevent these illegal acts. These illegal acts did proximately cause injury to Plaintiff, as set forth above in paragraphs 49-53, contrary to the provisions of 42 U.S.C. Section 1986.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT EIGHT

/Conspiracy for deprivation of Equal Protection of the Laws by wrongful and malicious prosecution./

58. Plaintiff alleges and realleges paragraphs 1-57 with the same force and effect as if fully set forth herein.

59. Some or all of defendants HANRAHAN, JALOVEC, SOROSKY, MELTREGER, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, SADUNAS, KOLUDROVIC, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff met from time to time with some or all of the other defendants named in this Paragraph and planned, agreed and conspired together with the purpose of and

intent to use their official positions in state and local government to deprive Plaintiff VERLINA BREWER of the Due Process Law and of the Equal Protection of the Laws by instituting against Plaintiff a prosecution for attempted murder, aggravated battery and other offenses that defendants knew to be false and fraudulent. Acting under color of state law, ordinances, statutes, custom, and usage, said defendants, although they knew that there was no justifiable reason to arrest or prosecute the Plaintiff, arrested Plaintiff for the purpose of suppressing and distorting the true nature and extent of defendants' own wrongdoing at 2337 West Monroe, Chicago, on December 4, 1969, in brutally and illegally injuring and humiliating Plaintiff and brutally killing other occupants of that apartment, Fred Hampton and Mark Clark.

60. Some or all of defendants HANRAHAN, JALOVEC, MELTZER, SOROSKY, MULCHROME, ERVANIAN, GROTH, BRODERICK, CAHMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff met from time to time after 5 a.m. on December 4, 1969, with some or all of the other defendants named in this Paragraph and, acting under color of state law, ordinances, statutes, custom and usage, did plan, agree and conspire together to deprive Plaintiff of the Due Process of Law and of the Equal Protection of the Laws by preparing and circulating to the public, official reports that purported to justify the continuation of the proceedings against the Plaintiff and that continued to suppress the true nature of the actions of some or all of the defendants on December 4, 1969. These reports, all calculated by the defendants to falsify and distort the occurrences of the brutal

raid of December 4, 1969, included both official statements to the news media and a series of formal proceedings including an investigation by the Internal Inspections Division of the Chicago Police Department, an inquest conducted by the Cook County Coroner's Office into the deaths of Fred Hampton and Mark Clark, and the presentation of the false charges to the Cook County Grand Jury for January 1970. The reports also included the investigation of the premises at 2337 West Monroe, Chicago, and purported ballistics and scientific analysis performed by the Crime Laboratory of the Chicago Police Department.

61. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff willfully and maliciously furthered the prosecution of Plaintiff known to said defendants to be unfounded, with the intent of discriminating against the Plaintiff because she is a member of the black race and because of her political beliefs and associations, in violation of the First and Fourteenth Amendments to the Constitution of the United States, and of 42 U.S.C., Sections 1983 and 1985.

62. This conspiracy to suppress the true nature of the raid on 2337 West Monroe Street, Chicago, Illinois, at 4:45 a.m. on December 4, 1969, was to be furthered by means of the prosecution of Plaintiff which was to be widely publicized in the public media and justified by erroneous descriptions of the events of the raid presented by Defendants at every formal and informal opportunity. In furtherance of the conspiracy, defendants committed the following overt acts, among others, all committed

under color of law and with knowledge that the prosecution of Plaintiff was wholly unfounded, and committed with intent to suppress the true nature of the raid:

a. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH arrested Plaintiff at about 5:00 a.m. on December 4, 1969, and subsequently lodged charges of attempted murder and aggravated battery, which defendants knew to be completely unfounded, against her.

b. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH, in violation of normal investigating procedures, prohibited the evidence technicians from the Task Force and the Mobile Crime Lab of the Chicago Police Department from gathering evidence until the above-named defendants had picked up many items themselves; said procedure was adopted by defendants in order to obscure the true nature of their brutal and murderous conduct during the raid on the apartment.

c. When the Defendant State's Attorney's police had left 2337 West Monroe Street, on the morning of December 4, 1969, Defendant KOLUDROVIC, as Supervising sergeant of the Mobile Crime Lab, Defendant JAMES DOE, and members of the Mobile Crime Lab not presently known to the Plaintiff, did intentionally limit their investigation of the physical evidence in the apartment to a search for evidence of any shots that might have been fired by the occupants of the apartment; the failure of these Defendants to examine the premises and its contents for the purpose of determining the nature and extent of the shots fired by the Defendant State's Attorney's police was intended to obscure the true nature of the events that had

transpired in the apartment.

d. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GROMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH, on December 4, 1969, caused charges of attempted murder and aggravated battery, which charges Defendants knew to be unfounded, to be lodged against Plaintiff for the purpose of causing the illegal incarceration of Plaintiff and in order to suppress the true nature of their raid.

e. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH met together on the morning of December 4, 1969, after the conclusion of the raid, and prepared a composite version of the events of the raid that would justify the wanton brutality practiced by the defendants during their raid.

f. Defendants HANRAHAN, JALOVEC, and GROTH released parts of this falsified account of the raid to the press, radio and television on December 4, 1969.

g. Defendant HANRAHAN and others not presently known to the Plaintiff denied Plaintiff a preliminary hearing on December 5, 1969, thereby shielding Defendant State's Attorney's Police from cross-examination that would have revealed the fabrications in their stories; defendant HANRAHAN thereby attempted to assure the success of a prosecution that he knew to be totally unfounded and forced Plaintiff to remain incarcerated.

h. On or about December 10, 1969, Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH released in a detailed report with accompanying photographs, another falsified version

of the events at 2337 West Monroe, Chicago, Illinois, on December 4, 1969, in order to obscure the true nature of defendants' conduct concerning the raid; this version was printed, as defendants intended, in the Chicago Tribune newspaper on December 11, 1969.

i. Defendants HANRAHAN, JALOVEC, and others not presently known to the Plaintiff, on or about December 11, 1969, staged and directed an exclusive, carefully rehearsed, and carefully edited television film, shown repeatedly in Chicago and throughout the country, which film depicted, through the words and actions of the Defendant-State's Attorney's police themselves, a description of the events of the raid that defendants knew to be false and erroneous.

j. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY and MARUSICH, on or about December 11, 1969, appeared on this exclusive television film, and some or all of them did thereon knowingly distort the description of the raid in which they had participated with the purpose of creating in the public mind a false and erroneous impression of the events that had transpired at 2337 West Monroe on December 4, 1969.

k. Defendant HANRAHAN on or about December 11, 1969, requested defendant CONLISK to have the Internal Inspections Division of the Chicago Police Department initiate a purported investigation of the raid for the purpose of presenting a false and distorted description of the raid in order to justify the conduct of the defendant State's Attorney's police and to justify the charges lodged against Plaintiff.

l. Defendants MULCHRONE and ERVANIAN, as supervising officers of the Internal Inspections Division, on or about December 15, 1969, intentionally modified normal investigating procedures of the Division

and intentionally limited the scope of the investigation for the express purpose of preventing any information contradictory to the false story already told by the Defendant State Attorney's police from emerging in that investigation, and for the express purpose of distorting the events of the raid so that the brutal conduct of the raiders would erroneously appear to the public to have been justified.

m. Defendant MEADE, on or about December 15, 1969, prepared the questions to be asked of the defendant State's Attorney's police in the Internal Inspections Division investigation and also prepared a set of proposed answers to these questions; Defendant MEADE purposely limited the questions prepared so as not to test the veracity of the defendant raiders nor to question in any way the accounts that said defendants had previously given of the raid, but rather to enable the Internal Inspections Division formally to approve these defendants' earlier account as accurate in the Division's report to the public without any independent attempt to test the truthfulness of this account.

n. Defendants JALOVEC, SOROSKY, and MELTREGER met with MEADE and GROTH on or about December 16, 1969, to revise and approve the questions to be asked of the defendant State's Attorney's police and the answers that said defendant policemen were to give at the interrogation by the Internal Inspections Division so that no statements contradicting earlier statements by said Defendant policemen would be made, all in order that the report of the Internal Inspections Division would falsely and erroneously exonerate the Defendant policement and justify their conduct on the raid and the subsequent prosecution of Plaintiff.

p. Defendant KUKOWINSKI, upon the direction of defendant MULCHROME

on or about December 16, 1969, directed defendant RICHARD ROE to limit the interrogation of the defendant State's Attorney's police by the Internal Inspections Division to those questions prepared by Defendant MEADE in order to distort the findings of the investigation and to enable the public report by the Internal Inspections Division to justify the conduct of said Defendants and to justify the unfounded prosecution of Plaintiff.

q. Defendant RICHARD ROE and others not presently known to the Plaintiffs did limit their interrogation of Defendant State's Attorney's police on or about December 16, 1969, to those questions prepared by Defendant MEADE in order to distort the findings of the Internal Inspections Division and enable its public report to justify the unfounded prosecution of Plaintiff.

r. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH testified falsely on or about December 16, 1969, in response to the questions asked of them by the Internal Inspections Division concerning the events of December 4, 1969.

s. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH testified falsely on or about January 8, 9, 12, 13, 14, 15, 16, and 19 1970, concerning the events of December 4, 1969, at 2337 West Monroe, at the Inquest held by the Coroner of Cook County, Illinois.

t. Defendants SADUNAS and KOLUDROVIC, acting under the direction of superior officers unknown to the Plaintiff, testified falsely on or about January 19, 20, and 21, 1970 at said inquest concerning the physical evidence removed from 2337 West Monroe and the analysis of

said evidence, with intent to create an erroneous impression of Plaintiff's conduct on December 4, 1969, and thereby to justify the conduct of Defendant State's Attorney's police and to justify the continuation of the unfounded prosecution of Plaintiff.

u. Defendant HANRAHAN, acting through Defendant JALOVEC, or others not presently known to the Plaintiff, did purposely obstruct the analysis of evidence by the Crime Lab of the Chicago Police Department by withholding from the Crime Lab the weapons used by the Defendant State's Attorney's police on the raid on December 4, 1969, and did thereby assist defendants PURTELL and SADUNAS in producing an incomplete, false and erroneous firearms report that misled the public into believing that Brenda Harris, an occupant of the apartment, had fired at the Defendant State's Attorney's police, thereby justifying the continuation of the unfounded prosecution of Plaintiff.

v. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, SADUNAS, and others not presently known to the Plaintiff, during January, 1970, gave under oath testimony they knew to be false, inaccurate and misleading before the Cook County Grand Jury for January, 1970 in the case of People of the State of Illinois v. Brenda Harris, et al., in order to continue the unfounded prosecution of Plaintiff.

63. As a direct and natural result of this conspiracy carried out by the defendants, the prosecution of Plaintiff was continued until May 8, 1970. Plaintiff incurred expenses for ballistics analyses and pathological examinations in the preparation of the defense to the unfounded prosecution. Plaintiff also suffered serious injury to her reputation and severe mental anguish as a natural result of the

extended continuation of the wrongful and malicious prosecution.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

COUNT NINE

/Intentional deprivation of civil rights by wrongful and malicious prosecution./

64. Plaintiff alleges and realleges paragraphs 1-63 with the same force and effect as if fully set forth herein.

65. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MULCHRONE, PURTELL, ERVANIAN, MEADE, KUKOWINSKI, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff intentionally, and/or with reckless disregard for the rights of Plaintiff, acting under color of state law, ordinances, statutes, custom and usage, caused Plaintiff to be arrested and prosecuted for attempted murder and aggravated battery, although they knew that there was no legal ground to arrest or prosecute Plaintiff. Said defendants intentionally did

these acts for the purpose of suppressing and distorting the true nature and extent of defendants' own wrongdoing at 2337 West Monroe, Chicago, on December 4, 1969, in brutally and illegally injuring and humiliating Plaintiff and brutally killing other occupants of that apartment. Said defendants further did these acts for the purpose of depriving Plaintiff of her rights, privileges and immunities guaranteed by the Constitution and laws of the United States, and protected under 42 U.S.C., Section 1983.

66. Some or all of Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MULCHRONE, ERVANIAN, MEADE, KUKOWINSKI, PURTELL, SADUNAS, KOLUDROVIC, DOE, ROE, and others not presently known to the Plaintiff intentionally, and/or with reckless disregard for the right of Plaintiff to be free from unfounded prosecution, acting under color of state law, ordinances, statutes, custom and usage, prepared and circulated to the public official reports that purported to justify the continuation of the criminal proceedings against the Plaintiff and that continued to suppress the true nature of the actions of some of the Defendants on December 4, 1969. These reports were all intended by the defendants to falsify and distort the occurrences of the brutal raid of December 4, 1969. The reports included both official statements to the news media and a series of formal proceedings, including an investigation by the Internal Inspections Division of the Chicago Police Department, an inquest conducted by the Coroner of Cook County into the deaths of Fred Hampton and Mark Clark, the investigation of the premises at

2337 West Monroe and the purported ballistics and scientific analyses performed by the Crime Laboratory of the Chicago Police Department, and the presentation of false charges and testimony to the Cook County Grand Jury, as set forth specifically in Paragraph 62. All these acts were committed with the intent of depriving Plaintiff of her rights, privileges and immunities under the Constitution and laws of the United States, protected by 42 U.S.C., Section 1983.

67. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff willfully and maliciously furthered the prosecution of Plaintiff, known to said defendants to be unfounded, with the intent of discriminating against the Plaintiff because she is a member of the black race and because of her political beliefs and associations, in violation of the First and Fourteenth Amendments to the Constitution of the United States, and of 42 U.S.C., Sections 1983 and 1985.

68. As a direct and natural result of these acts of the defendants, the prosecution of Plaintiff suffered serious injury to her reputation and severe mental anguish.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY,

MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the costs of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

COUNT TEN

/Neglect to prevent harm from conspiracy for deprivation of Equal Protection of the Laws by wrongful and malicious prosecution./

69. Plaintiff alleges and realleges paragraphs 1-68 with the same force and effect as if fully set forth herein.

70. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, DALEY, CONLISK, MULCHRONE, ERVANIAN, MEADE, KUKOWINSKI, SOROSKY, MELTREGER, PURTELL, SADUNAS, KOLUDROVIC, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff knew of the conspiracy described in paragraphs 59-62 to deprive Plaintiffs of the Equal Protection of the Laws as guaranteed by the laws and the Fourteenth Amendment to the Constitution of the United States, prior to the execution of said conspiracy and throughout the duration of said conspiracy. These defendants, as officials supervising the persons conducting and continuing the unfounded and malicious prosecutions, and as persons officially responsible for investigations that, if conducted fairly and impartially, would have shown the prosecutions to be unfounded, had the power, authority and

responsibility to prevent the committing of these illegal acts against the Plaintiff, but these defendants neglected and refused to prevent these illegal acts. These illegal acts proximately caused injury to the Plaintiff in her reputation, by severe mental anguish, and other injuries as set forth in Paragraphs 61 and 63, contrary to the provisions of 42 U.S.C., Section 1986.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, DALEY, CONLISK, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and other such relief as to this court seems just, equitable and proper.

COUNT ELEVEN

/Negligent deprivation of civil rights by failure of municipal corporation properly to hire, train, and supervise its police employees./

71. Plaintiff alleges and realleges paragraphs 1-70 with the same force and effect as if fully set forth herein.

72. Defendant CITY OF CHICAGO was and still is the statutory public employer of Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI,

CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, DALEY, CONLISK, MULCHROHE, ERVANIAN, MEADE, NIKOWINSKI, KOLUDROVIC, SADUNAS, PURTELL, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff.

73. Defendant CITY OF CHICAGO did fail to properly hire, train, and supervise the Defendant Police Officers who were at the time of the illegal raid assigned to the Cook County State's Attorney's Office.

74. Defendant CITY OF CHICAGO had consistently failed to discipline officers who had used deadly and excessive force against citizens prior to December 4, 1969. Said failure to so discipline past offenders of the Chicago Police Department was known to the defendants and did give said Defendant police officers license to use excessive and deadly force against the Plaintiff without fear of punishment.

75. The raid upon the residence of the Plaintiff on the morning of December 4, 1969, by the duly appointed Defendant Chicago Police officers did proximately cause serious injury to the Plaintiff and did deprive her of her right to full and equal benefit of all laws; as this raid was illegal and performed in a discriminatory and racist manner aginst the Plaintiff, as a black woman, contrary to the Fourteenth Amendment of the Constitution of the United States, and contrary to 42 U.S.C., Sections 1981, 1983, and 1988.

76. Defendant CITY OF CHICAGO failed properly to hire, train and supervise the Defendant Police Officers who were assigned to conduct an examination of the scene of the incident, 2337 West Monroe, assigned to analyze the items of evidence recovered there,

and those officers who were assigned to supervise or conduct the purported investigation of the raid for the Internal Inspections Division of the Chicago Police Department.

77. Defendant CITY OF CHICAGO had, prior to December 4, 1969, consistently failed to discipline officers who had conducted unprofessional and biased examinations of physical evidence, or who had conducted purported investigations for the Internal Inspections Division of the Chicago Police Department with the purpose of suppressing evidence of wrongdoing by police officers against whom complaints had been filed. Said failure to so discipline past offenders in the Crime Laboratory and the Internal Inspections Division of the Chicago Police Department was known to defendants and gave said defendants license to conduct their investigations and examinations with the purpose of furthering the unfounded prosecution of Plaintiff without fear of punishment of said defendants.

78. The malicious and unfounded prosecution of Plaintiff, continuing from December 4, 1969, until May 8, 1970, planned, executed and furthered by the duly appointed defendant police officers named in this count did proximately cause serious injury to the Plaintiff and did deprive her of her right to full and equal benefit of all laws, as these prosecutions were unfounded and conducted in a discriminatory and racist manner against the Plaintiff, as a black woman, contrary to the Fourteenth Amendment to the Constitution of the United States and contrary to the provisions of 42 U.S.C., Sections 1981, 1983, and 1988.

79. Defendant CITY OF CHICAGO's grossly negligent failure

properly to hire, train, and supervise the individual defendants named in Paragraph 72 and Defendant CITY OF CHICAGO's grossly negligent failure properly to discipline past offenders who had used excessive and deadly force, who had conducted unprofessional and biased examinations of premises and physical evidence, and who had conducted purported investigations for the Internal Inspections Division with the purpose of suppressing evidence of wrongdoing by police officers directly and proximately caused the serious injury of Plaintiff, in violation of the Constitution and laws of the United States, as alleged in Paragraphs 25-40 and 61-63.

WHEREFORE PLAINTIFF VERLINA BREWER by her next friend, WILLIAM H. BREWER, demands judgment against Defendant CITY OF CHICAGO for compensatory damages in the amount of $400,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, proper and equitable.

COUNT TWELVE

/Liability of municipal corporations through respondeat superior for the wrongful conduct of their public employees/

80. Plaintiff alleges and realleges paragraphs 1-79 with the same force and effect as if fully set forth herein.

81. Defendant CITY OF CHICAGO was and is a duly incorporated municipality under the Constitution, laws and statutes of the State of Illinois.

82. Defendant COOK COUNTY, ILLINOIS, is a duly established legislative corporation under the laws, statutes, and Constitution of

the State of Illinois.

83. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, CONRISK, MULCHROHE, ERVANIAN, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIK, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiff were duly employed officials in the Police Department of the City of Chicago at all times material to this complaint.

84. Defendant DALEY was the duly elected and duly employed Mayor of the City of Chicago, at all times material to this complaint.

85. Defendants HANRAHAN, JALOVEC, MELTZER, SOROSKY, and others not presently known to the Plaintiff were duly elected and/or appointed officials of Cook County, Illinois, and were in the employment of this County, at all times material to this complaint.

86. At all times material to this complaint, said defendant City and County Officials were acting within the scope of their employment by said City and/or County and were acting as agents and employees thereby. While acting in this capacity, said defendants did commit illegal and wrongful acts as alleged in Paragraphs 1-79, particularly Paragraphs 25-32 and 59-62. These wrongful acts did proximately and directly cause injury to Plaintiff, as alleged in Paragraphs 26-40 and 61-63, in violation of rights, privileges and immunities guaranteed under the Constitution and laws of the United States, including 42 U.S.C., Sections 1981, 1983, and 1988. These rights are further protected through 42 U.S.C., Section 1988, by the law of the State of Illinois,

which makes a municipal corporation liable for the wrongful and tortious acts of its employees.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants CITY OF CHICAGO and COOK COUNTY, ILLINOIS, jointly and severally, for compensatory damages in the amount of $400,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, proper and equitable.

COUNT THIRTEEN

[Action under Illinois law for assault and battery]

87. Plaintiff alleges and realleges Paragraphs 1-86 with the same force and effect as though fully set forth herein.

88. Some or all of Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GUNMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiff, acting at the direction of Defendants HANRAHAN, JALOVEC, and others not presently known to the Plaintiff, at about 4:45 a.m. on December 4, 1969, recklessly, wantonly, unlawfully, and with malice did fire about sixty shots from sub-machine guns and other firearms into a room at 2337 West Monroe, Chicago, occupied by Plaintiff VERLINA BREWER, a citizen of Michigan. The directions so to use firearms were given by Defendants HANRAHAN and JALOVEC with malice.

89. Plaintiff was grievously wounded by this gunfire, and suffered injury as alleged in Paragraphs 27-31.

90. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT,

DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH were acting within the scope of their employment by Defendant CITY OF CHICAGO at the time of the assault and battery alleged in Paragraphs 88-89.

91. Defendants HANRAHAN and JALOVEC were acting within the scope of their employment by Defendant COOK COUNTY, ILLINOIS, when they directed the commission of the assault and battery alleged in Paragraphs 88-89.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend, WILLIAM R. BREWER, demands judgment against Defendants CITY OF CHICAGO; COOK COUNTY, ILLINOIS; HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to her, for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees and such other relief as to this Court seems just, proper and equitable.

COUNT FOURTEEN

[Action under Illinois law for false imprisonment]

92. Plaintiff alleges and realleges Paragraphs 1-91 with the same force and effect as though fully set forth herein.

93. Some or all of Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH, knowing that there was no probable cause to arrest Plaintiff,

VERLINA BREWER, caused her to be arrested with intent to deprive her illegally of her freedom on December 4, 1969.

94. Some or all of Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH, either with malice or without malice intentionally caused Plaintiff to be detained illegally, without any formal charge, for several hours on December 4, 1969. Said defendants furthermore, either with malice or without malice intentionally caused Plaintiff to be detained illegally for several days thereafter on false and fraudulent charges of attempted murder and aggravated battery, and, with malice or with negligence, denied Plaintiff an opportunity at a preliminary hearing immediately to prove that her detention was unlawful.

95. This illegal detention directly and proximately caused Plaintiff serious injury, as alleged in Paragraphs 51-53.

96. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH were acting within the scope of their employment by Defendant CITY OF CHICAGO at the time of the false imprisonment alleged in Paragraphs 93-94.

97. Defendants HANRAHAN and JALOVEC were acting within the scope of their employment by Defendant COOK COUNTY, ILLINOIS, when they directed the commission of the false imprisonment alleged in Paragraphs 93-94.

WHEREFORE, PLAINTIFF VERLINA BREWER, by her next friend, WILLIAM R. BREWER, demands judgment against Defendants CITY OF CHICAGO; COOK

COUNTY, ILLINOIS; HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to her, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

COUNT FIFTEEN

[Action under Illinois law for malicious prosecution]

98. Plaintiff alleges and realleges Paragraphs 1-97 with the same force and effect as though fully set forth herein.

99. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, DALEY, CONLISK, MULCHROHE, ERVANIAN, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE and others not presently known to the Plaintiff, on and after December 4, 1969, and continuing until May 8, 1970, by the acts alleged in Paragraphs 59-62, caused the institution and continuation of an illegal prosecution of Plaintiff VERLINA BREWER for attempted murder and aggravated battery.

100. Some or all of the defendants named in Paragraph 99 prosecuted Plaintiff with malice, and with knowledge that there was no probable cause to prosecute

101. Defendant CITY OF CHICAGO, through the acts of its employees,

who acted within the scope of their employment at all times material to this complaint, including Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, CONLISK, MULCHROSE, ERVANIAN, MEADE, KUKOWINSKI, FURTELL, SADUNAS, KOLUDROVIC, JAMES DOE, RICHARD ROE, and JOHN DOE, knew all the circumstances of the raid and ratified, adopted and furthered the continuation of this malicious prosecution.

102. Defendant COOK COUNTY, ILLINOIS, through the acts of its employees who acted within the scope of their employment at all times material to the complaint, including Defendants HANRAHAN, JALOVEC, MELTREGER, and SOROSKY, knew all the circumstances of the raid and ratified, adopted and furthered the continuation of this malicious prosecution.

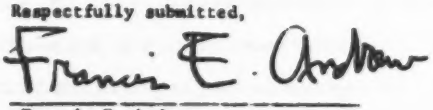
103. On or about May 8, 1970, all charges against Plaintiff VERLINA BREWER were dismissed, without conviction of Plaintiff, by the Circuit Court of Cook County, Illinois.

104. This malicious prosecution directly and proximately caused Plaintiff serious injury, as alleged in Paragraph 63.

WHEREFORE PLAINTIFF VERLINA BREWER, by her next friend WILLIAM R. BREWER, demands judgment against Defendants CITY OF CHICAGO, COOK COUNTY, ILLINOIS, HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to her, for compensatory damages in the amount of $200,000 and further demands judgment against said defendants, jointly and severally, for punitive damages in

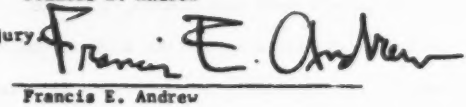
the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

Respectfully submitted,



Francis E. Andrew

Plaintiff demands trial by jury.



Francis E. Andrew

FRANCIS E. ANDREW
DENNIS CUNNINGHAM
JEFFREY HAAS
Attorneys for Plaintiff
2156 North Halsted Street
Chicago, Illinois 60614
Telephone: 312-929-1880

Of Counsel:

WILLIAM J. BENDER
ARTHUR KINOY
c/o Center for Constitutional Rights
588 Ninth Avenue
New York, New York 10036

(1)

J67

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DEBORAH JOHNSON; RONALD SATCHEL, by his next friend, CLARA BRIDGES; HAROLD BELL; BLAIR ANDERSON, by his next friend, [redacted] HUSTER; BRENDA HARRIS; and LOUIS TAUELUCK,
Plaintiffs,

- vs -

THE CITY OF CHICAGO, a Municipal Corporation; COOK COUNTY, ILLINOIS, a Local Public Corporation; EDWARD V. HANRAHAN; RICHARD S. JALOVEC; DANIEL GROTH; RAY BRODERICK; EDWARD CARMODY; JOHN CISZEWSKI; WILLIAM CORBETT; JAMES DAVIS; JOSEPH GORMAN; LYNWOOD HARRIS; FRED HOWARD; ROBERT HUGHES; GEORGE JONES; PHILIP JOSEPH; WILLIAM KELLY; JOHN MARUSICH; RICHARD J. DALEY, Mayor of the City of Chicago; JAMES B. CONLISK, Superintendent, Chicago Police Department; JOHN MULCHRONE; HARRY LAVARIAN; JOHN MEADE; ROBERT KUKOWINSKI; JAMES MELTZINGER; SHELDON SOROSKY; DAVID PURTELL; CHARLES KOLUDROVIC; JOHN SABUNAS; JOHN DOE; RICHARD ROE; JAMES DOE; and OTHERS NOT PRESENTLY KNOWN TO THE PLAINTIFFS,
Defendants.

CIVIL ACTION

No. 70-3029

COMPLAINT FOR DAMAGES

JURISDICTION

1. This is a civil action seeking redress against the defendants for committing acts under color of law, depriving the plaintiffs of their rights under the Constitution and laws of the United States. Specifically, some or all of the defendants,

while acting in their individual and official capacities as Chicago policemen, state's attorney's police, and as state, county, and city officials, on December 4, 1969, assaulted the plaintiffs with deadly weapons, caused serious bodily injury to some of the plaintiffs, and thereafter imprisoned the plaintiffs falsely and prosecuted them wrongfully and maliciously in an attempt to conceal the true nature of the occurrences of December 4, 1969. By these acts committed under color of state law, the defendants deprived the plaintiffs of their rights, privileges and immunities as guaranteed by the First, Fourth, Fifth, Eighth, Ninth, Thirteenth and Fourteenth Amendments to the Constitution of the United States and protected under 42 U.S.C., Sections 1981, 1982, 1983, 1985, 1986, and 1988.

2. The jurisdiction of this Court is further invoked pursuant to 28 U.S.C., Sections 1331 and 1343. The amount in controversy, exclusive of interest and costs, exceeds the sum or value of ten thousand dollars.

3. Copies of notices sent in accordance with Illinois Revised Statutes, Ch. 85, Section 8-102 are attached hereto as Appendix A and hereby made a part of this Complaint.

PARTIES

A. Plaintiffs

4. Plaintiff RONALD SATCHEL is a resident and citizen of the City of Chicago, the State of Illinois, and the United States.

Plaintiff SATCHEL, a black male, is a minor of twenty years of age, and is suing by his next friend, CLARA BRIDGES.

5. Plaintiff DEBORAH JOHNSON, a black female of nineteen years of age, is a resident and citizen of the City of Chicago, the State of Illinois, and the United States.

6. Plaintiff HAROLD BELL, a black male of twenty-three years of age, is a resident and citizen of the City of Rockford, the State of Illinois, and the United States.

7. Plaintiff BRENDA HARRIS, a black female of eighteen years of age, is a resident and citizen of the City of Chicago, the State of Illinois, and the United States.

8. Plaintiff BLAIR ANDERSON is a resident and citizen of the City of Chicago, the State of Illinois, and the United States. Plaintiff ANDERSON, a black male, is a minor of nineteen years of age, and is suing by his next friend BENJAMIN [redacted] HESTER.

9. Plaintiff LOUIS TRUELUCK, a black male of thirty-nine years of age, is a resident of the City of Chicago and State of Illinois, and a citizen of the United States.

10. At the time of the raid hereinafter alleged, and at the inception of the conspiracy that was allegedly formed to suppress the true nature of that raid, all Plaintiffs were members of the

Black Panther Party.

B. Defendants

11. Defendant HANRAHAN was at all times material to this complaint the duly elected State's Attorney for Cook County, Illinois. Defendant HANRAHAN had supervisory authority over all Assistant State's Attorneys in the office of the State's Attorney for Cook County, including defendants JALOVEC, MELTREGER, and SOROSKY, and supervisory authority over all officers of the Chicago Police Department assigned to the office of the State's Attorney for Cook County, including defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH.

12. Defendant JALOVEC was, at all times material to the complaint, a duly appointed Assistant State's Attorney for Cook County, Illinois, and in charge of the Special Prosecutions Unit of said State's Attorneys office. Defendant JALOVEC was the immediate supervisor of defendant GROTH and the police officers in Groth's unit, and he represented some or all of those defendants in the purported investigation of this matter by the Internal Inspections Division of the Chicago Police Department.

13. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY and MARUSICH were, at all times material to this complaint, duly

appointed police officers of the City of Chicago, detailed to and/or on detached service with the Cook County State's Attorney's Office as State's Attorney's Police.

14. Defendant DALEY, at all times material to this complaint, was the duly elected Mayor of the City of Chicago, State of Illinois. In that capacity, he had appointed Defendant CONLISK to serve, subject to Defendant DALEY's continuing approval, as Superintendent of Police. Through his control over the office of Superintendent of Police, Defendant DALEY, at all times material to this complaint, had the power to direct the activities of the Chicago Police Department and its employees.

15. Defendant CONLISK, at all times material to this complaint, was the duly appointed Superintendent and Chief Executive Officer of the Chicago Police Department. In that capacity, he was responsible for the general management and control of the police department and had full and complete authority to administer the department, including the operations of the Internal Inspections Division and the Crime Laboratory of the Chicago Police Department.

16. Defendant MULCHRONE was, at all times material to this complaint, a duly appointed Deputy Superintendent of the Chicago Police Department with supervisory responsibility for the Internal Inspections Division of the Chicago Police Department.

17. Defendant ERVANIAN, at all times material to this complaint, was a Captain of the Chicago Police Department and Director of the Internal Inspections Department of the Chicago Police Department.

18. Defendant MEADE, at all times material to this complaint, was a duly appointed Sergeant in the employ of the Chicago Police Department. He was assigned special responsibility for the investigation by the Internal Inspections Division of the raid staged on December 4, 1969, on the apartment occupied by plaintiffs.

19. Defendant KUKOWINSKI, at all times material to this complaint, was a Lieutenant on the Chicago Police Department and the head of the Excessive Force Unit of the Internal Inspections Division of the Chicago Police Department.

20. Defendants SOROSKY and HELTREGER, at all times material to this complaint, were duly appointed Assistant State's Attorneys for Cook County, Illinois. Both were assigned to the Special Prosecutions Unit under the supervision of Defendant JALOVEC, and both represented Defendant State's Attorney's police in the purported investigation of this matter by the Internal Inspections Division of the Chicago Police Department.

21. Defendant PURTELL, at all times material to this complaint, was a duly appointed official in the Chicago Police Department and

Director of the Crime Laboratory of the Chicago Police Department.

22. Defendant SADUNAS, at all times material to this complaint, was a duly appointed Firearms Examiner in the Crime Laboratory of the Chicago Police Department, who examined ballistics material recovered from the apartment occupied by Plaintiffs.

23. Defendant KOLUDROVIC, at all times material to this complaint, was a duly appointed Sergeant in the Chicago Police Department and a supervising officer of the Mobile Crime Laboratory Unit of the Chicago Police Department Crime Laboratory. In his capacity as supervisor of the Mobile Crime Lab, defendant KOLUDROVIC was responsible for the careful and impartial investigation of the scene of every violent crime for the purpose of locating, gathering, labelling, photographing, and evaluating all items that might prove helpful as physical evidence found at the scene. In this capacity, defendant KOLUDROVIC was called to 2337 West Monroe Street, Chicago, on the morning of December 4, 1969.

24. Defendant JAMES DOE, at all times material to this complaint, was an evidence technician of the Area Task Force of the Chicago Police Department. In this capacity as an evidence technician, defendant JAMES DOE was responsible for the careful and impartial investigation of the scene of every violent crime for the purpose of locating, photographing, gathering, labelling, and evaluating all items that might prove helpful as physical

evidence found at the scene. In this capacity, defendant JAMES DOE was called to 2337 West Monroe Street, Chicago on the morning of December 4, 1969.

25. Defendant RICHARD ROE, at all times material to this complaint, was a duly appointed Sergeant of the Chicago Police Department, assigned to the Excessive Force Unit of the Internal Inspections Division of the Chicago Police Department. He was the immediate interrogator of Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY,and MARUSICH in the purported investigation of this matter by the Internal Inspections Division.

26. Defendant JOHN DOE, and others not presently known to the plaintiffs, at all times material to this complaint, were Chicago policemen, State's Attorney's Police, and other Federal, State, County and City officials and agents who participated in the planning and execution of a raid on 2337 West Monroe Street, Chicago, and subsequent proceedings concerning that raid, including the purported investigation of the matter by the Internal Inspections Division of the Chicago Police Department, the inquest into the deaths of Fred Hampton and Mark Clark conducted by the Coroner of Cook County, and the presentation of criminal charges against plaintiffs to the Cook County Grand Jury of January 1970.

27. All defendants are sued in both their individual and official capacities.

28. On information and belief, all defendants are residents and citizens of the County of Cook, State of Illinois, and of the United States.

COUNT ONE

[Intentional deprivation of civil rights by illegal entry, assault, battery, and other illegal acts.]

29. Plaintiffs allege and reallege paragraphs 1-28 with the same force and effect as if fully set forth herein.

30. At some time or times on or prior to the morning of December 4, 1969, defendants HAMMAHAN, JALOVEC, GROTH, DAVIS, CARMODY, CISZEWSKI, GORMAN, JONES, HUGHES, JOSEPH, MARUSICH, HARRIS, HOWARD, CORBETT, KELLY, BRODERICK, DOE, and others not presently known to the plaintiffs met in various groups and thereby together planned a raid upon the apartment located at 2337 West Monroe Street, Chicago, Illinois, occupied by the plaintiffs.

31. At approximately 4:45 a.m., on December 4, 1969, defendants GROTH, DAVIS, CARMODY, CISZEWSKI, CORBETT, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiffs, under color of a search warrant illegally obtained from state authorities,

and otherwise under color of law, illegally forced entry into the apartment at 2337 West Monroe, Chicago, Cook County, Illinois, occupied by Plaintiffs.

32. After effecting this illegal entry, some or all of said defendants, under color of law but without justification, fired with submachine guns, shotguns and other weapons almost one hundred shots into the rooms occupied by plaintiffs JOHNSON, SATCHEL, BELL, ANDERSON, HARRIS, and TRUELUCK.

33. This gunfire grievously wounded Plaintiffs SATCHEL, ANDERSON, and HARRIS.

34. Plaintiff JOHNSON'S fiance, FRED HAMPTON, was killed in her presence by bullets fired by one or more of the defendants who entered this apartment.

35. Some or all of these defendants, acting under color of law as police officers, physically abused, immodestly exposed, verbally abused and illegally arrested Plaintiff JOHNSON, who was eight months pregnant.

36. Some or all of these defendants, acting under color of law as police officers, physically and verbally abused and illegally arrested Plaintiffs SATCHEL, BELL, ANDERSON, HARRIS, and TRUELUCK.

37. Said defendants did illegally search and ransack the

above-mentioned apartment. Under color of law but without justification, said defendants took money, damaged and destroyed personal property of the plaintiffs, and spoliated the evidence of the illegal acts committed by said defendants.

38. As a direct and proximate result of the afore-mentioned acts of the defendants, plaintiffs SATCHEL, HARRIS, JOHNSON, BELL, ANDERSON and TRUELUCK have suffered injury and mental anguish, and will continue to so suffer in the future. Plaintiffs HARRIS, ANDERSON, and SATCHEL have spent much time in the hospital, have undergone numerous operations , and have received permanent physical injury which has caused physical pain and suffering in the past and will continue to cause such pain.

39. Defendants HANNAHAN, JALOVEC, GROTH, BRODERICK, CARNODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the plaintiffs, willfully, maliciously, and with specific intent planned and executed the acts as alleged in Paragraphs 30-38. These acts directly and proximately caused the serious injury to each and all plaintiffs. This unjustifiable use of excessive and deadly force by these defendants, acting under color of law, deprived the plaintiffs of their rights, privileges and immunities as guaranteed by the Constitution and laws of the United States and protected

under 42 U.S.C. sections 1981 et seq., particularly Section 1983.

40. The unlawful and sadistic acts of said defendants, who attacked Plaintiffs as members of the Black Panther Party. because of their beliefs, thoughts, words, and associations, deprived the Plaintiffs of their right to free speech, expression, association, and assembly as guaranteed by the First Amendment to the Constitution of the United States.

41. Plaintiffs were deprived of their right to be free from illegal searches and seizures as guaranteed by the Fourth Amendment to the Constitution of the United States by the defendants' illegal entry into and pillaging of the apartment occupied by plaintiffs.

42. Plaintiffs were deprived of their right to life, liberty and property as guaranteed by the Fifth and Fourteenth Amendments to the Constitution of the United States by their illegal and summary punishment by said defendants, which not only denied the plaintiffs due process of law but flaunted that denial to create fear and terror in the Black Community of Chicago.

43. Plaintiffs were deprived of their right to be free from cruel and unusual punishment as guaranteed by the Eighth Amendment to the Constitution of the United States, by the defendants' brutal, unjustifiable, and summary punishment of said plaintiffs.

44. Plaintiffs were deprived of their right to privacy as guaranteed by the Ninth Amendment to the Constitution of the United States by said defendants' illegal entry and unjustifiable use of deadly and excessive force.

45. The deprivation of rights guaranteed to the plaintiffs by the First, Fourth, Fifth, Eighth and Ninth Amendments are protected against state action by the due process clause of the Fourteenth Amendment. to the Constitution of the United States.

46. These acts perpetrated on plaintiffs as black citizens were so contrary to all standards of humanity and to all standards of constitutional government by law that plaintiffs were thereby deprived of their right to be free from badges and indicia of slavery as guaranteed by the Thirteenth Amendment to the Constitution of the United States.

47. Plaintiffs were deprived of their right to equal protection of the laws as guaranteed by the Fourteenth Amendment to the Constitution of the United States as said defendants under color of law did shoot, wound, and brutalize the Plaintiffs because of their race and political beliefs.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and

severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000 , and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI,

CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN [redacted] HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of

$200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT TWO

/Negligent deprivation of civil rights by illegal entry, assault, battery, and other illegal acts./

48. Plaintiffs allege and reallege paragraphs 1-47 with the same force and effect as if fully set forth herein.

49. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, HARRIS, HOWARD, and others not presently known to the plaintiffs, under color of law, negligently used deadly and excessive force to assault plaintiffs, and illegally forced entry into the apartment at 2337 West Monroe, Chicago, Cook County, Illinois, and by those illegal acts did directly and proximately cause serious injury, pain, suffering and humiliation to plaintiffs SATCHEL, JOHNSON, BELL, HARRIS, ANDERSON, and TRUELUCK, depriving them of their rights, privileges and immunities guaranteed by the Constitution and laws of the United States, as set forth in Count One above, particularly Paragraphs 40-47, and protected under 42 U.S.C., Sections 1981 et seq., particularly Section 1983.

50. Defendants HANRAHAN, JALOVEC, GROTH, JOHN DOE and others not presently known to the Plaintiffs, acting under

color of state law, statute, ordinance, custom and usage, did negligently plan and create a situation where deadly and excessive force was likely to be used by planning to take on the raid of 2337 West Monroe Street excessive firearm weaponry; by planning to execute the raid in the early morning hours of December 4, 1969, when Defendants knew persons would be present in the apartment, rather than at a time when they knew the apartment to be vacant; by failing to equip the raiding party with tear gas or other means for peacefully subduing the occupants of the apartment if said occupants should resist service of the search warrant; and, on information and belief, in sending on this assignment officers who in the past had been found by the Chicago Police Department to have used excessive and deadly force to do damage to citizens in the black community. Said Defendants did thereafter negligently permit the use of deadly and excessive force, which proximately and directly caused serious injury, physical pain and suffering to Plaintiffs SATCHEL, HARRIS,and ANDERSON, and serious injury to Plaintiffs JOHNSON, BELL, and TRUELUCK, depriving them of their rights, privileges and immunities guaranteed by the Constitution and laws of the United States, as set forth in Count One above, and particularly Paragraphs 40-47, and protected under 42 U.S.C., Sections 1981 et seq., particularly Section 1983.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN,

JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of

$200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN [redacted] HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him,

jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT THREE

/Conspiracy for deprivation of Equal Protection of the Laws by illegal entry, assault, battery, and other illegal acts/

51. Plaintiffs allege and reallege Paragraphs 1-50 with the same force and effect as if fully set forth herein.

52. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and other defendants not presently known to the plaintiffs, prior to the illegal raid of December 4, 1969, upon 2337 West Monroe Street, Chicago, Illinois, met and planned this illegal raid and agreed and conspired together to enter the apartment illegally and to use excessive and deadly force upon the occupants of 2337 West Monroe Street, which occupants included Plaintiffs SATCHEL, JOHNSON, BELL, HARRIS, ANDERSON, and TRUELUCK. Each defendant did agree to and did plan this raid with the knowledge and purpose that it would deprive said occupants of their rights,

privileges, and immunities including the Equal Protection of the Laws, as guaranteed under the Constitution and laws of the United States, specifically 42 U.S.C., Sections 1983 and 1985. Said defendants did purposefully plan, while acting under the guise and color of state law, statutes, and customs, to discriminate against the occupants of 2337 West Monroe Street because they are members of the black race and because of their political beliefs. Acting in accordance with this plan and conspiracy, under color of state law, the defendants did execute this illegal raid and did use brutal and excessive force, as set forth in the overt acts alleged in Paragraphs 30-37, above. This course of conduct by the defendants proximately caused serious injury to the plaintiffs, as alleged in Paragraphs 31-47, and deprived them of the Equal Protection of the Laws.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants,

jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF LOUIS TRUELOCK demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT FOUR

/Neglect to prevent harm from conspiracy for deprivation of civil rights by illegal entry, assault, and other illegal acts./

53. Plaintiffs allege and reallege paragraphs 1-52 with the same force and effect as if fully set forth herein.

54. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiffs did have knowledge of the conspiracy as alleged in Paragraph 51 to deprive Plaintiffs SATCHEL, JOHNSON, BELL, ANDERSON, HARRIS, and TRUELUCK of the Equal Protection of the Laws as guaranteed by the Constitution and laws of the United States, prior to the execution of this illegal raid. These defendants, as immediate superiors of the raiding party or as co-participants in the raid, did have the power to prevent the committing of these illegal acts against the Plaintiffs and did neglect and refuse to prevent these illegal acts. These illegal acts were committed during the raid upon the apartment occupied by Plaintiffs and did proximately cause serious injury to them as alleged in Paragraphs 31-47, contrary to the provisions of 42 U.S.C., Section 1986.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH,

JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN [redacted] HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of

$200,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT FIVE

/Intentional deprivation of civil rights by false imprisonment./

55. Plaintiffs allege and reallege Paragraphs 1-54 with the same force and effect as if fully set forth herein.

56. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARNODY, CISZEWSKI, COMETT, DAVIS, COWAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiffs did willfully, maliciously, and with specific intent cause all plaintiffs to be incarcerated without legal cause, to be precluded from gaining their liberty on bail, and to be prevented from demonstrating the lack of foundation of the charges against them, thereby causing them to be deprived of their liberty without due process of law, in violation of the Fifth and Fourteenth Amendments of the Constitution of the United States, and in violation of rights protected under 42 U.S.C. Section 1983.

57. Said defendants did cause Plaintiffs to be deprived of their liberty by pressing against each of them charges of attempted murder and aggravated battery that said defendants knew to be wholly unfounded; by demanding that bail on these charges be set

at $100,000 for each Plaintiff, an amount defendants knew to be prohibitive for Plaintiffs and an amount designed by defendants to prevent Plaintiffs from making bail and gaining their freedom; and by preventing Plaintiffs from obtaining a preliminary hearing on December 5, 1969, whereby Plaintiffs could have shown the lack of foundation of the charges.

58. The acts of said defendants were further intended to prevent Plaintiffs from telling the public of the defendants' murderous conduct at 2337 West Monroe, Chicago, thereby intending to chill the exercise by Plaintiffs of their right of free speech guaranteed by the First Amendment of the Constitution of the United States and 42 U.S.C., Section 1983.

59. As a result of the false charges lodged by these defendants, each Plaintiff was imprisoned falsely under color of law for eighteen days, from December 4, 1969, to December 21, 1969.

60. As a direct and proximate result of these false charges lodged by these defendants, Plaintiffs SATCHEL, JOHNSON, BELL, ANDERSON, HARRIS, and TRUELUCK suffered serious injury to his reputation and severe mental anguish.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and

further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH,

KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend [redacted] HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT SIX

/Conspiracy for deprivation of Equal Protection of the Laws by false imprisonment./

61. Plaintiffs allege and reallege paragraphs 1-60 with the same force and effect as if fully set forth herein.

62. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiffs on December 4, 1969, did meet and plan to lodge against Plaintiffs charges they knew to be wholly unfounded, and did agree and conspire together to cause Plaintiffs SATCHEL, JOHNSON, BELL, HARRIS, ANDERSON, and TRUELUCK to be imprisoned illegally. Each defendant did agree to and did plan to place these charges with the knowledge and purpose that they would deprive Plaintiffs of their rights, privileges, and immunities as guaranteed under the First, Fifth, and Fourteenth Amendments of the Constitution of the United States, and protected under 42 U.S.C., Sections 1983 and 1985. They did purposely plan, while acting under the guise and color of state law, statutes, and customs, to discriminate against the Plaintiffs because they are members of the black race and because of their political beliefs and associations. Acting in accordance with this plan and conspiracy, some or all of these defendants knowingly pressed false charges of attempted murder and aggravated battery, knowingly demanded prohibitively high bail of $100,000 on Plaintiffs, and willfully

denied Plaintiffs a preliminary hearing. This conspiracy and these overt acts by defendants did proximately cause Plaintiffs' illegal imprisonment, as set forth in paragraphs 56-60, depriving them of rights under the First, Fifth and Fourteenth Amendments of the Constitution of the United States, including the right to Equal Protection of the Laws.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper,

and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN [redacted] HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and

severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT SEVEN

/Neglect to prevent harm from conspiracy for deprivation of Equal Protection of the Laws by false imprisonment./

63. Plaintiffs allege and reallege paragraphs 1-62 with the same force and effect as if fully set forth herein.

64. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, and others not presently known to the Plaintiffs did have knowledge of the conspiracy as alleged in paragraph 62 to deprive Plaintiffs of the Equal Protection of the Laws as guaranteed by the Constitution and laws of the United States,

prior to the lodging of the false charges of attempted murder and aggravated battery, and throughout the period during which Plaintiffs were illegally confined. These defendants did have the authority and power to prevent the committing of these illegal acts against the Plaintiffs and did neglect and refuse to prevent these illegal acts. These illegal acts did proximately cause injury to Plaintiffs, as set forth above in paragraphs 56-60, contrary to the provisions of 42 U.S.C. Section 1986.

WHEREFORE PLAINTIFF RONALD SHOELL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CASSIDY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CASSIDY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's

fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, for compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000, plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to her, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just; proper and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and

further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

WHEREFORE PLAINTIFF LOUIS TANCHUCK demands judgment against Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, JOHN DOE, and others not presently known to him, jointly and severally, compensatory damages in the amount of $100,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $100,000 plus the cost of this action, attorney's fees and such other relief as to this court seems just, proper, and equitable.

COUNT EIGHT

/Conspiracy for deprivation of Equal Protection of the Laws by wrongful and malicious prosecution./

65. Plaintiffs allege and reallege paragraphs 1-64 with the same force and effect as if fully set forth herein.

66. Some or all of defendants HANRAHAN, JALOVEC, SOROSKY, MELTREGER, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, SADUNAS, KOLUDROVIC, JAMES DOE, RICHARD ROE, JOHN DOE, and

others not presently known to the Plaintiffs met from time to time with some or all of the other defendants named in this Paragraph and planned, agreed and conspired together with the purpose of and intent to use their official positions in state and local government to deprive Plaintiffs SATCHEL, JOHNSON, BELL, ANDERSON, HARRIS, and TRUELUCK of the Due Process Law and of the Equal Protection of the Laws by instituting against Plaintiffs a prosecution for attempted murder, aggravated battery and other offenses that defendants knew to be false and fraudulent. Acting under color of state law, ordinances, statutes, custom, and usage, said defendants, although they knew that there was no justifiable reason to arrest or prosecute the Plaintiffs, arrested Plaintiffs for the purpose of suppressing and distorting the true nature and extend of defendants' own wrongdoing at 2337 West Monroe, Chicago, on December 4, 1969, in brutally and illegally injuring and humiliating Plaintiffs and brutally killing other occupants of that apartment, Fred Hampton and Mark Clark.

67. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiffs met from time to time after

5 a.m. on December 4, 1969, with some or all of the other defendants named in this Paragraph and, acting under color of state law, ordinances, statutes, custom and usage, did plan, agree and conspire together to deprive Plaintiffs of the Due Process of Law and of the Equal Protection of the Laws by preparing and circulating to the public, official reports that purported to justify the continuation of the proceedings against the Plaintiffs and that continued to suppress the true nature of the actions of some or all of the defendants on December 4, 1969. These reports, all calculated by the defendants to falsify and distort the occurrences of the brutal raid of December 4, 1969, included both official statements to the news media and a series of formal proceedings including an investigation by the Internal Inspections Division of the Chicago Police Department, an inquest conducted by the Cook County Coroner's Office into the deaths of Fred Hampton and Mark Clark, and the presentation of the false charges to the Cook County Grand Jury for January 1970. The reports also included the investigation of the premises at 2337 West Monroe, Chicago, and purported ballistics and scientific analysis performed by the Crime Laboratory of the Chicago Police Department.

68. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHROME, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOJINSKI, PURTELL, KOLUDROVIC, SADUNAS,

JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiffs willfully and maliciously furthered the prosecution of Plaintiffs, known to said defendants to be unfounded, with the intent of discriminating against the Plaintiffs because they are members of the black race and because of their political beliefs and assocations, in violation of the First and Fourteenth Amendments to the Constitution of the United States, and of 42 U.S.C., Sections 1983 and 1985.

69. This conspiracy to suppress the true nature of the raid on 2337 West Monroe Street, Chicago, Illinois, at 4:45 a.m. on December 4, 1969, was to be furthered by means of the prosecution of Plaintiffs which was to be widely publicized in the public media and justified by erroneous descriptions of the events of the raid presented by Defendants at every formal and informal opportunity. In furtherance of the conspiracy, defendants committed the following overt acts, among others, all committed under color of law and with knowledge that the prosecutions of Plaintiffs were wholly unfounded, and committed with intent to suppress the true nature of the raid:

a. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH arrested Plaintiffs at about 5:00 a.m. on December 4, 1969, and subsequently lodged charges of attempted

murder and aggravated battery, which defendants knew to be completely unfounded, against all plaintiffs.

b. Defendants GROTH, BRODERICK, CALMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH, in violation of normal investigating procedures, prohibited the evidence technicians from the Task Force and the Mobile Crime Lab of the Chicago Police Department from gathering evidence until the above-named defendants had picked up many items themselves; said procedure was adopted by defendants in order to obscure the true nature of their brutal and murderous conduct during the raid on the apartment.

c. When the Defendant State's Attorney's police had left 2337 West Monroe Street, on the morning of December 4, 1969, Defendant KOLUDROVIC, as Supervising sergeant of the Mobile Crime Lab, Defendant JAMES DOE, and members of the Mobile Crime Lab not presently known to the Plaintiffs, did intentionally limit their investigation of the physical evidence in the apartment to a search for evidence of any shots that might have been fired by the occupants of the apartment; the failure of these Defendants to examine the premises and its contents for the purpose of determining the nature and extent of the shots fired by the Defendant State's Attorney's police was intended to obscure the true nature of the events that had transpired in the apartment.

d. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH, on December 4, 1969, caused charges of attempted murder and aggravated battery, which charges Defendants knew to be unfounded, to be lodged against all Plaintiffs for the purpose of causing the illegal incarceration of Plaintiffs and in order to suppress the true nature of their raid.

e. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH met together on the morning of December 4, 1969, after the conclusion of the raid, and prepared a composite version of the events of the raid that would justify the wanton brutality practiced by the defendants during their raid.

f. Defendants HANRAHAN, JALOVEC, and GROTH released parts of this falsified account of the raid to the press, radio and television on December 4, 1969.

g. Defendant HANRAHAN and others not presently known to the Plaintiffs denied Plaintiffs a preliminary hearing on December 5, 1969, thereby shielding Defendant State's Attorney's Police from cross-examination that would have revealed the fabrications in their stories; defendant HANRAHAN thereby attempted to assure the success of a prosecution that he knew to be totally unfounded and forced Plaintiffs to remain incarcerated for two weeks in lieu of posting bail that

Defendant HANRAHAN knew to be prohibitively high.

h. On or about December 10, 1969, Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH released in a detailed report with accompanying photographs, another falsified version of the events at 2337 West Monroe, Chicago, Illinois, on December 4, 1969, in order to obscure the true nature of defendants' conduct concerning the raid; this version was printed, as defendants intended, in the Chicago Defender newspaper on December 11, 1969.

i. Defendants HANRAHAN, JALOVEC, and others not presently known to the Plaintiffs on or about December 11, 1969, staged and directed an exclusive, carefully rehearsed, and carefully edited television film, shown repeatedly in Chicago and throughout the country, which film depicted, through the words and actions of the Defendant-State's Attorney's police themselves, a description of the events of the raid that defendants knew to be false and erroneous.

j. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY and MARUSICH on or about December 11, 1969, appeared on this exclusive television film, and some or all of them did thereon knowingly distort the description of the raid in which they had participated with the purpose of creating in the public mind a false and erroneous impression of the events that had transpired at 2337 West Monroe on December 4, 1969.

k. Defendant HANRAHAN on or about December 11, 1969, requested defendant CONLISK to have the Internal Inspections Division of the Chicago Police Department initiate a purported investigation of the raid for the purpose of presenting a false and distorted description of the raid in order to justify the conduct of the defendant State's Attorney's police and to justify the charges lodged against Plaintiffs.

l. Defendants MULCHRONE and KAVANIAN, as supervising officers of the Internal Inspections Division, on or about December 15, 1969, intentionally modified normal investigating procedures of the Division and intentionally limited the scope of the investigation for the express purpose of preventing any information contradictory to the false story already told by the Defendant State Attorney's police from emerging in that investigation, and for the express purpose of distorting the events of the raid so that the brutal conduct of the raiders would erroneously appear to the public to have been justified.

m. Defendant MEADE, on or about December 15, 1969, prepared the questions to be asked of the defendant State's Attorney's police in the Internal Inspections Division investigation and also prepared a set of proposed answers to these questions; Defendant MEADE purposely limited the questions prepared so as not to test the veracity of the defendant raiders nor to question in any way the accounts that said defendants had previously given of the raid, but

rather to enable the Internal Inspections Division formally to approve these defendants' earlier account as accurate in the Division's report to the public without any independent attempt to test the truthfulness of this account.

n. Defendants JALOVEC, SOROSKY, and [illegible] met with defendants [illegible] on or about December 16, 1969, to revise and approve the questions to be asked of the defendant State's Attorney's police and the answers that said defendant policemen were to give at the interrogation by the Internal Inspections Division so that no statements contradicting earlier statements by said Defendant policemen would be made, all in order that the report of the Internal Inspections Division would falsely and erroneously exonerate the Defendant policemen and justify their conduct on the raid and the subsequent prosecution of Plaintiffs.

o. Defendants JALOVEC, SOROSKY, and [illegible] met with said Defendant State's Attorney's police on or about December 18, 1969, prior to the interrogation by the Internal Inspections Division and informed said defendant policemen of the questions to be asked of them and of the proper answers they should give in order to justify their conduct and to justify the continued prosecution of Plaintiffs.

p. Defendant KUKOWINSKI, upon the direction of defendant [illegible], on or about December 16, 1969, directed defendant RICHARD ROE, to limit the interrogation of the defendant State's

Attorney's police by the Internal Inspections Division to those questions prepared by Defendant MEADE in order to distort the findings of the investigation and enable the public report by the Internal Inspections Division to justify the conduct of said Defendants and to justify the unfounded prosecution of Plaintiffs.

q. Defendant RICHARD ROE and others not presently known to the Plaintiffs did limit their interrogation of Defendant State's Attorney's police on or about December 16, 1969, to those questions prepared by Defendant MEADE in order to distort the findings of the Internal Inspections Division and enable its public report to justify the unfounded prosecution of Plaintiffs.

r. Defendants CROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH testified falsely on or about December 16, 1969, in response to the questions asked of them by the Internal Inspections Division concerning the events of December 4, 1969.

s. Defendants CROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, and MARUSICH testified falsely on or about January 8, 9, 12, 13, 14, 15, 16, and 19, 1970, concerning the events of December 4, 1969, at 2337 West Monroe, at the Inquest held by the Coroner of Cook County, Illinois.

t. Defendants SADUNAS and KOLUDROVIC, acting under the direction of superior officers unknown to the Plaintiffs, testified falsely on or about January 19, 20, and 21, 1970, at said inquest concerning the physical evidence removed from 2337 West Monroe and the analysis of said evidence, with intent to create an erroneous impression of Plaintiffs' conduct on December 4, 1969, and thereby to justify the conduct of Defendant State's Attorney's police and to justify the continuation of the unfounded prosecution of Plaintiffs.

u. Defendant HANRAHAN, acting through Defendant JALOVEC, or others not presently known to the Plaintiffs, did purposely obstruct the analysis of evidence by the Crime Lab of the Chicago Police Department by withholding from the Crime Lab the weapons used by the Defendant State's Attorney's police on the raid on December 4, 1969, and did thereby assist defendants PURTELL and SADUNAS in producing an incomplete, false and erroneous firearms report that misled the public into believing that Plaintiff HARRIS had fired at the Defendant State's Attorney's police, thereby justifying the continuation of the unfounded prosecution of Plaintiffs.

v. Defendants GROTH, BRODERICK, CAHILLY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, SADUNAS, and others not presently known to the Plaintiffs, during January 1970, gave under oath testimony they knew to be false, inaccurate and misleading before the

Cook County Grand Jury for January 1970 in the case of People of the State of Illinois v. Brenda Harris et al., in order to continue the unfounded prosecution of Plaintiffs.

70. As a direct and natural result of this conspiracy carried out by the defendants, the prosecutions of Plaintiffs were continued until May 8, 1970. Each of the Plaintiffs incurred expenses for ballistics analyses and pathological examinations in the preparation of the defense to the unfounded prosecution. Each of the Plaintiffs also suffered serious injury to his reputation and severe mental anguish as a natural result of the extended continuation of the wrongful and malicious prosecutions.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, MELTZECER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUMAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE,

ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend, BENJAMIN [redacted] HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS,

GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

COUNT NINE

/Intentional deprivation of civil rights by wrongful and malicious prosecution./

71. Plaintiffs allege and reallege paragraphs 1-70 with the same force and effect as if fully set forth herein.

72. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MULCHRONE, ERVANIAN, MEADE, KUKOWINSKI, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiffs intentionally, and/or with reckless disregard for the rights of Plaintiffs, acting under color of state law, ordinances, statutes, custom and usage, caused Plaintiffs to be arrested and prosecuted for attempted murder and aggravated battery, although they knew that there was no legal ground to arrest or prosecute Plaintiffs. Said defendants intentionally

did these acts for the purpose of suppressing and distorting the true nature and extent of defendants' own wrongdoing at 2337 West Monroe, Chicago, on December 4, 1969, in brutally and illegally injuring and humiliating Plaintiffs and brutally killing other occupants of that apartment. Said defendants further did these acts for the purpose of depriving Plaintiffs of their rights, privileges and immunities guaranteed by the Constitution and laws of the United States, and protected under 42 U.S.C., Section 1983.

73. Some or all of Defendants HANRAHAN, JALOVEC, BRODERICK, SOROSKY, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, MELTREGER, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MULCHRONE, ERVANIAN, MEADE, KUKOWINSKI, CROWN, PURTELL, SADUNAS, KOLUDROVIC, DOE, ROE, and others not presently known to the Plaintiffs intentionally, and/or with reckless disregard for the right of Plaintiffs to be free from unfounded prosecution, acting under color of state law, ordinances, statutes, custom and usage, prepared and circulated to the public official reports that purported to justify the continuation of the criminal proceedings against the Plaintiffs and that continued to suppress the true nature of the actions of some of the Defendants on December 4, 1969. These reports were all intended by the defendants to falsify and distort the occurrences of the brutal raid of December 4, 1969. The reports included both official statements to the news media and a series of formal proceedings, including an investigation by the Internal Inspections Division of the Chicago Police Department,

an inquest conducted by the Coroner of Cook County into the deaths of Fred Hampton and Mark Clark, the investigation of the premises at 2337 West Monroe and the purported ballistics and scientific analyses performed by the Crime Laboratory of the Chicago Police Department, and the presentation of false charges and testimony to the Cook County Grand Jury, as set forth specifically in Paragraph 69. All these acts were committed with the intent of depriving Plaintiffs of their rights, privileges and immunities under the Constitution and laws of the United States, protected by 42 U.S.C., Section 1983.

74. Some or all of defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiffs willfully and maliciously furthered the prosecution of Plaintiffs, known to said defendants to be unfounded, with the intent of discriminating against the Plaintiffs because they are members of the black race and because of their political beliefs and associations, in violation of the First and Fourteenth Amendments to the Constitution of the United States, and of 42 U.S.C., Sections 1983 and 1985.

75. As a direct and natural result of these acts of the defendants, the prosecutions of Plaintiffs were continued until May 8, 1970, and each of the Plaintiffs suffered serious injury to his reputation and severe mental anguish.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE,

ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN [redacted] HESTER, demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others

not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

COUNT TEN

/Neglect to prevent harm from conspiracy for deprivation of Equal Protection of the Laws by wrongful and malicious prosecution./

76. Plaintiffs allege and reallege paragraphs 1-75 with the same force and effect as if fully set forth herein.

77. Defendants HANRAHAN, JALOVEC, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, DALEY, CONLISK, MULCHRONE, ERVANIAN, MEADE, KUKOWINSKI, SOROSKY, MELTREGER, PURTELL, SADUNAS, KOLUDROVIC, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiffs knew of the conspiracy described in paragraphs 66-69 to deprive Plaintiffs of the Equal Protection of the Laws as guaranteed by the laws and the Fourteenth Amendment to the Constitution of the United States, prior to the execution of said conspiracy and throughout the duration of said conspiracy. These defendants, as officials supervising the persons conducting and continuing the unfounded and malicious prosecutions, and as persons officially responsible for investigations that, if conducted fairly and impartially, would have shown the prosecutions to be unfounded, had the power, authority and responsibility to prevent the committing of these illegal acts against the Plaintiffs, but these defendants neglected and refused to prevent these illegal acts. These illegal acts proximately caused injury to the Plaintiffs in their reputations, by severe mental anguish, and other injuries as set forth in Paragraphs 68 and 70, contrary to the provisions of 42 U.S.C., Section 1986.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants HANRAHAN, DALEY, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, CONLISK, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI,

PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, DALEY, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, CONLISK, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, DALEY, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, CONLISK, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him,

jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, DALEY, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, CONLISK, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to her, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN [redacted] HESTER, demands judgment against Defendants HANRAHAN, DALEY, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, CONLISK, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages

in the amount of $200,000 plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendants HANRAHAN, JALOVEC, MELTREGER, SOROSKY, MULCHRONE, DALEY, ERVANIAN, GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, CONLISK, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to him, jointly and severally for compensatory damages in the amount of $200,000, and further demands judgment against said defendants, jointly and severally, for punitive damages in the amount of $200,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, equitable and proper.

COUNT ELEVEN

/Negligent deprivation of civil rights by failure of municipal corporation properly to hire, train, and supervise its police employees./

78. Plaintiffs allege and reallege paragraphs 1-77 with the same force and effect as if fully set forth herein.

79. Defendant CITY OF CHICAGO was and still is the statutory public employer of Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, DALEY, CONLISK, MULCHRONE, ERVANIAN, MEADE, KUKOWINSKI, KOLUDROVIC, SADUNAS, PURTELL, JAMES DOE, RICHARD ROE,

JOHN DOE, and others not presently known to the Plaintiffs.

80. Defendant CITY OF CHICAGO did fail to properly hire, train and supervise the Defendant Police Officers who were at the time of the illegal raid assigned to the Cook County State's Attorney's Office.

81. Defendant CITY OF CHICAGO had consistently failed to discipline officers who had used deadly and excessive force against citizens prior to December 4, 1969. Said failure to so discipline past offenders of the Chicago Police Department was known to the defendants and did give said Defendant police officers license to use excessive and deadly force against the Plaintiffs, without fear of punishment.

82. The raid upon the residence of the Plaintiffs, on the morning of December 4, 1969, by the duly appointed Defendant Chicago Police officers did proximately cause serious injury to the Plaintiffs and did deprive them of their right to full and equal benefit of all laws; as this raid was illegal and performed in a discriminatory and racist manner against the Plaintiffs, as black men and women, contrary to the Fourteenth Amendment of the Constitution of the United States, and contrary to 42 U.S.C., Sections 1981, 1983, and 1988.

83. Defendant CITY OF CHICAGO failed properly to hire, train, and supervise the Defendant Police Officers who were assigned to conduct an examination of the scene of the incident, 2337 West Monroe, assigned to analyze the items of evidence

recovered there, and those officers who were assigned to supervise or conduct the purported investigation of the raid for the Internal Inspections Division of the Chicago Police Department.

84. Defendant CITY OF CHICAGO had, prior to December 4, 1969, consistently failed to discipline officers who had conducted unprofessional and biased examinations of physical evidence, or who had conducted purported investigations for the Internal Inspections Division of the Chicago Police Department with the purpose of suppressing evidence of wrongdoing by police officers against whom complaints had been filed. Said failure to so discipline past offenders in the Crime Laboratory and the Internal Inspections Division of the Chicago Police Department was known to defendants and gave said defendants license to conduct their investigations and examinations with the purpose of furthering the unfounded prosecution of Plaintiffs, without fear of punishment of said defendants.

85. The malicious and unfounded prosecution of Plaintiffs, continuing from December 4, 1969, until May 8, 1970, planned executed, and furthered by the duly appointed defendant police officers named in this count did proximately cause serious injury to the Plaintiffs and did deprive them of their right to full and equal benefit of all laws, as these prosecutions were unfounded and conducted in a discriminatory and racist manner against the Plaintiffs, as black men and women, contrary to the Fourteenth Amendment to the Constitution of the United States

and contrary to the provisions of 42 U.S.C., Sections 1981, 1983, and 1988.

86. Defendant CITY OF CHICAGO'S grossly negligent failure properly to hire, train, and supervise the individual defendants named in Paragraph 79 and Defendant CITY OF CHICAGO'S grossly negligent failure properly to discipline past offenders who had used excessive and deadly force, who had conducted unprofessional and biased examinations of premises and physical evidence, and who had conducted purported investigations for the Internal Inspections Division with the purpose of suppressing evidence of wrongdoing by police officers directly and proximately caused the serious injury of Plaintiffs, in violation of the Constitution and laws of the United States, as alleged in Paragraphs 31-47 and 68-70.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendant CITY OF CHICAGO for compensatory damages in the amount of $400,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, proper and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendant CITY OF CHICAGO for compensatory damages in the amount of $300,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, proper and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendant CITY OF CHICAGO for compensatory damages in the amount

$300,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendant CITY OF CHICAGO for compensatory damages in the amount of $400,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN [redacted] HESTER, demands judgment against Defendant CITY OF CHICAGO for compensatory damages in the amount of $400,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

WHEREFORE PLAINTIFF LOUIS TRUELUCK demands judgment against Defendant CITY OF CHICAGO for compensatory damages in the amount of $300,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

COUNT TWELVE

/Liability of municipal corporations through respondeat superior for the wrongful conduct of their public employees./

87. Plaintiffs allege and reallege paragraphs 1-86 with the same force and effect as if fully set forth herein.

88. Defendant CITY OF CHICAGO was and is a duly incorporated municipality under the Constitution, laws and statutes of the State of Illinois.

89. Defendant COOK COUNTY, ILLINOIS, is a duly established legislative corporation under the laws, statutes, and Constitution of the State of Illinois.

90. Defendants GROTH, BRODERICK, CARMODY, CISZEWSKI, CORBETT, DAVIS, GORMAN, HARRIS, HOWARD, HUGHES, JONES, JOSEPH, KELLY, MARUSICH, CONLISK, MULCHRONE, ERVANIAN, MEADE, KUKOWINSKI, PURTELL, KOLUDROVIC, SADUNAS, JAMES DOE, RICHARD ROE, JOHN DOE, and others not presently known to the Plaintiffs were duly employed officials in the Police Department of the City of Chicago, at all times material to this complaint.

91. Defendant DALEY was the duly elected and duly employed Mayor of the City of Chicago, at all times material to this complaint.

92. Defendants HARTMAN, JALOVEC, MELTREGER, SOROSKY, and others not presently known to the Plaintiffs were duly elected and/or appointed officials of Cook County, Illinois, and were in the employment of this County, at all times material to this complaint.

93. At all times material to this complaint, said defendant City and County Officials were acting within the scope of their employment by said City and/or County and were acting as agents and employees thereby. While acting in this capacity, said defendants did commit illegal and wrongful acts as alleged in Paragraphs 1-86, particularly Paragraphs 30-39 and 66-69. These wrongful acts did proximately and directly cause injury

to Plaintiffs, as alleged in Paragraphs 31-47 and 68-70, in violation of rights, privileges and immunities guaranteed under the Constitution and laws of the United States, including 42 U.S.C., Sections 1981, 1983, and 1988. These rights are further protected, through 42 U.S.C., Section 1988, by the law of the State of Illinois, which makes a municipal corporation liable for the wrongful and tortious acts of its employees.

WHEREFORE PLAINTIFF RONALD SATCHEL, by his next friend CLARA BRIDGES, demands judgment against Defendants CITY OF CHICAGO and COOK COUNTY, ILLINOIS, for compensatory damages in the amount of $400,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, proper and equitable.

WHEREFORE PLAINTIFF DEBORAH JOHNSON demands judgment against Defendants CITY OF CHICAGO and COOK COUNTY, ILLINOIS, for compensatory damages in the amount of $300,000, plus the cost of this action, attorney's fees, and such other relief as to this court seems just, proper and equitable.

WHEREFORE PLAINTIFF HAROLD BELL demands judgment against Defendants CITY OF CHICAGO and COOK COUNTY, ILLINOIS, for compensatory damages in the amount of $300,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

WHEREFORE PLAINTIFF BRENDA HARRIS demands judgment against Defendants CITY OF CHICAGO and COOK COUNTY, ILLINOIS, for compensatory

damages in the amount of $400,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

WHEREFORE PLAINTIFF BLAIR ANDERSON, by his next friend BENJAMIN HESTER, demands judgment against Defendants CITY OF CHICAGO and COOK COUNTY, ILLINOIS, for compensatory damages in the amount of $400,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

WHEREFORE PLAINTIFF LOUIS TAUBLUCK demands judgment against Defendants CITY OF CHICAGO and COOK COUNTY, ILLINOIS, for compensatory damages in the amount of $300,000, plus the cost of this action, attorney's fees, and such other relief as to this Court seems just, proper and equitable.

Respectfully submitted,

Francis E. Andrew

Kermit Coleman

Plaintiff RONALD SATCHEL, by his next friend CLARA BRIDGES; Plaintiff DEBORAH JOHNSON; Plaintiff HAROLD BELL; Plaintiff BLAIR ANDERSON, by his next friend BENJAMIN HESTER; Plaintiff BRENDA HARRIS;

and Plaintiff LOUIS TRUELUCK, each demands trial by jury.

Francis E. Andrew

Kermit Coleman

FRANCIS E. ANDREW
DENNIS CUNNINGHAM
JEFFREY HAAS
Attorneys for Plaintiffs
2156 North Halsted Street
Chicago, Illinois 60614
Telephone: 312-949-1880

KERMIT COLEMAN
Attorney for Plaintiffs
6 South Clark Street
Chicago, Illinois 60603
Telephone: 312-236-5564

Of Counsel:

WILLIAM J. BENDER
ARTHUR KINOY
c/o Center for Constitutional
Rights
588 Ninth Avenue
New York, New York 10036